PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

General Motors Corporation
12200 Lafayette Center Road
Roanoke, IN 46783

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T003-5959-00036	
Issued by: Original signed by Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: June 24, 2002 Expiration Date: June 24, 2007

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary automobile and light duty truck assembly plant.

Responsible Official:	James DeLuca
Source Address:	12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address:	12200 Lafayette Center Road, Roanoke, IN 46783
General Source Phone No.	(219) 673-2480
SIC Code:	3711
County Location:	Allen
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major, under PSD Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) Facility-wide natural gas usage, including combustion units described as follows:

(1) One (1) natural gas/No. 6 oil/landfill gas fired boiler, identified as 003, constructed in August 1985, with a maximum capacity of 240 MM Btu/hr, using low excess air as control, and exhausting to stack 01,

(2) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, constructed in April 1992, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NOx burners and flue gas recirculation as control, and exhausting to stack 01,

(3) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, constructed in March, 1993, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NOx burners and flue gas recirculation as control, and exhausting to stack 01,

(4) Space heaters and process heaters using natural gas, identified as 007, with capacities from 10 to 100 MM Btu/hr, using no control, and exhausting to various stacks denoted as stack 13, and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.

(b) One (1) ELPO dipping system, identified as 006, constructed in August 1985, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02,

(c) One (1) topcoat system, identified as 008, constructed in August 1985, using natural gas fired catalytic oxidizer ovens identified as #1 - #10 as VOC control, with maximum capacity of the oxidizer ovens #1 - #7 being 7.5 MM Btu/hr each, and the maximum capacity of oxidizer ovens #8 - #10 being 9.5 MM Btu/hr each, and water wash as PM control, and exhausting to stack 04,

(d) Miscellaneous sealers/adhesives/additives/solvents, identified as 009, constructed in August 1985, using no controls, and exhausting to stacks 07 and 08,

(e) One (1) primer surfacer system, identified as 010, constructed in March 1994, using a natural gas fired regenerative thermal oxidizer with a maximum capacity of 16 MM Btu/hr as VOC control, and water wash as PM control, and exhausting to stack 03,

(f) One (1) final repair operation, identified as 012, constructed in August 1985, using no control, and exhausting to stack 06 and spot repair stalls,

(g) One (1) maintenance paint operation, identified as 013, constructed in August 1985, using no control, and exhausting to stack 10,

(h) One (1) gasoline fill operation, identified as 014, constructed in August 1985, using a natural gas afterburner with a maximum capacity of 0.15 MM Btu/hr as VOC control, and exhausting to stack 12.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(b) Storage tanks, identified as 1 (solvent/thinner), 2, (solvent/thinner), 7(automatic transmission fluid), 12 (fuel oil), 13 (fuel oil), 14 (fuel oil), 15 (fuel oil), and two (2) 18,900 gallon waste purge solvent tanks, all constructed after July 23, 1984.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

B.2 Permit Term [326 IAC 2-7-5(2)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the

"responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

(b) If, after issuance of this permit, it is determined that the permit is in nonconformance with

an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.

(d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independently of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms

prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of

the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report, or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.

B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy any records that must be kept under the conditions of this permit;

(c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act and IC 13-14-2-2, sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act and IC 13-14-2-2, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61,

Subpart M, is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality

100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once per day until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

(a) A compliance schedule for meeting the requirements of 40 CFR 68; or

(b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP).

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee

shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(i) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(j) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time. Such records may be maintained in computerized form.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must

comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
Facility-wide natural gas usage, including combustion units described as follows:

(a) One (1) natural gas/No. 6 oil/landfill gas fired boiler, identified as 003, constructed in August 1985, with a maximum capacity of 240 MM Btu/hr, using low excess air as control, and exhausting to stack 01,

(b) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NOx burners and flue gas recirculation as control, and exhausting to stack 01, (constructed in April, 1992)

(c) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NOx burners and flue gas recirculation as control, and exhausting to stack 01, (constructed in March, 1993)

(d) Space heaters and process heaters using natural gas, identified as 007, with capacities from 10 to 100 MM Btu/hr, using no control, and exhausting to various stacks denoted as stack 13, and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 New Source Performance Standards (NSPS) for Fossil-Fuel-Fired Steam Generators [40 CFR 60, Subpart Db]

(a) Boiler 004, constructed in April, 1992, is subject to the requirements of NSPS, 326 IAC 12, (40 CFR 60.44, Subpart Db) because the boiler was constructed after the applicability date of the rule. Pursuant to 40 CFR 60.44b(a).

(1) NOx emissions from Boiler 004 shall not exceed 0.098 lb/ MM Btu for natural gas and 0.13 for No. 2 fuel oil combustion. Compliance with this limit will satisfy the requirements of 40 CFR 60, Subpart Db and 326 IAC 2-2-3 (PSD BACT).

(2) Opacity shall not exceed 20% for 6-min average except for one 6-min period per hour of not more than 27% opacity. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

(3) SO2 emissions shall not exceed 0.5 pound per million Btu heat input when burning No. 2 fuel.

(b) Boiler 005, constructed in March, 1993, is subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60.44, Subpart Db) because the boiler was constructed after the applicability date of the rule. Pursuant to 40 CFR 60.44b,

(1) NOx emissions shall not exceed 0.098 lb/MM Btu from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil. Compliance with this limit shall satisfy the requirements of 40 CFR 60, Subpart Db.

(2) Opacity shall not exceed 20% for 6-min average except for one 6-min period per hour of not more than 27% opacity. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

D.1.2 Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2-3 PSD BACT:

(a) for Boiler 003:

(1) PM emissions from Boiler 003 shall not exceed 0.015 lb/MM Btu when combusting natural gas, or 0.056 lb/MM Btu when combusting No. 2 or No. 6 fuel oil. Compliance with this limit shall satisfy the requirements of 326 IAC 6-2-4.

(2) PM emissions shall not exceed 16 tons per year from the combustion of natural gas, and shall not exceed 59 tons per year from the combustion of No. 2 and No. 6 fuel oil.

(3) NOx emissions shall not exceed 0.098 lb/MM Btu when combusting natural gas, or 0.3 lb/MM Btu when combusting fuel oil. These limits are considered PSD BACT for this facility.

(b) for Boiler 004:

(1) No. 2 fuel consumption shall not exceed 1.1 million gallons and this, with a fuel sulfur content of 0.49 % shall in effect limit SO2 emissions to less than 40 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply.

(2) NOx emissions shall not exceed 0.098 lb/MM Btu input from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu input from the combustion of No. 2 fuel oil. Fuel gas recirculation and low NOx burners are considered PSD BACT for this facility.

(c) for Boiler 005:

(1) No. 2 fuel consumption shall not exceed 3.2 million gallons, and with an average heat content of 140,000 Btu/gallons, based on a 12 month rolling average, this fuel input limit shall, in effect, limit NOx emissions to less than 40 tons per consecutive 12 month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.

(2) NOx emissions shall not exceed 0.098 lb/MM Btu from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil.

D.1.3 SO2 Emission Limits [326 IAC 7-1.1-2]

Pursuant to 326 IAC 7-1.1-2, SO2 emissions:

(a) from Boiler 003 shall not exceed 1.6 lb/MM Btu when combusting No. 6 fuel oil, or 0.5 lb/MM Btu when combusting No. 5 fuel oil.

(b) from Boiler 004 shall not exceed 0.5 lb/MM Btu when combusting No. 2 fuel oil,

(c) from Boiler 005 shall not exceed 0.5 lb/MM Btu when combusting No. 2 fuel oil.

D.1.4 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating),

particulate matter (PM) emissions from the 240, 228, and 228 million BTU/hour boilers, 003, 004, and 005, shall be limited as follows:

(a) Boiler 003 shall be limited to 0.26 pound per million BTU heat input.

(b) Boiler 004 shall be limited to 0.22 pound per million BTU heat input.

(c) Boiler 005 shall be limited to 0.20 pound per million BTU heat input.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these boilers.

Compliance Determination Requirements

D.1.6 Sulfur Content Compliance [326 IAC 7-2-1]

Pursuant to 326 IAC 7-2-1, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed 0.5 pounds per million Btu by:

(a) Fuel sampling and analysis data shall be collected pursuant to procedures specified in 326 IAC 3-7-4 for oil combustion, and this data may be used to determine compliance or noncompliance with the emission limitations contained in 326 IAC 7-1-1. Computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on AP-42 emission factors. Fuel sampling and analysis data shall be collected as follows:

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty tank is refilled, a new sample and analysis would be required upon filling, or

(b) Compliance or noncompliance with the emission limitation specified in 326 IAC 7-1.1 may be determined by conducting a stack test for sulfur dioxide emissions from the boilers, using 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8, in accordance with the procedures in 326 IAC 3-6, or

(c) Upon written notification of a facility owner or operator to the department, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance.

(d) A determination of noncompliance by any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other methods.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Continuous Emission Monitoring

(a) Pursuant to 326 IAC 2-2, 326 IAC 3-5, and 326 IAC 12, the Permittee shall continuously monitor and record the following parameters from each boiler to demonstrate compliance with the Conditions D.1.1, D.1.2, and D.1.3:

(1) nitrogen oxide concentration,

(2) sulfur dioxide concentration, and

(3) opacity.

(b) The continuous monitoring systems have been installed and operational prior to conducting the performance tests. A monitoring protocol has been performed in accordance with the applicable procedures under 40 CFR 60, Appendix B, Performance Specification 1 and 326 IAC 3-5.

(c) The Permittee shall record the output of the system and shall perform the required record keeping, pursuant to 326 IAC 3-5-6, and reporting, pursuant to 326 IAC 3-5-7.

(d) In instances of CEM downtime, compliance with the NOx and SO_2 emission limits established in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by the use of the appropriate AP42 emission factors. Compliance with the particulate emission limits contained in Conditions D.1.2 and D.1.4 shall be determined using the appropriate emission factors, or by burning clean fuels such as natural gas, landfill gas or distillate fuel oil.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the NOx, SO_2, and opacity emission limits established in Conditions D.1.1, D.1.2, and D.1.3.

(1) Calendar dates covered in the compliance determination period;

(2) The Permittee shall record the output of the continuous monitoring systems and shall perform the required record keeping, pursuant to 326 IAC 3-5-6.

(b) The Permittee shall keep records of heat input for each of the boilers.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall certify, on the form provided, that natural gas was fired in the boiler at all times during each quarter. Alternatively, the Permittee shall report the number of days during which an alternate fuel was burned during each quarter.

(c) The Permittee shall submit CEM reporting requirements pursuant to 326 IAC 3-5-5(e).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) ELPO prime coating system, identified as 006, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02,

Miscellaneous sealers/adhesives/additives/solvents, identified as 009, using no controls, and exhausting to stacks 07 and 08,

One (1) final repair operation, identified as 012, using no control, and exhausting to stack 06 and spot repair stalls,

One (1) maintenance paint operation, identified as 013, using no control, and exhausting to stack 10,

One (1) gasoline fill operation, identified as 014, using a natural gas afterburner with a maximum capacity of 0.15 MM Btu/hr as VOC control, and exhausting to stack 12.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60, Subpart MM]

Pursuant to 40 CFR 60, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the ELPO prime coating system, 006, shall not exceed 0.17 kg/l of applied coating solids.

D.2.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC input to the source's surface coating operations shall be limited such that the VOC potential to emit shall be limited to 3,204 tons per twelve consecutive month period.

D.2.3 Automobile and Light Duty Truck Coating Operations [326 IAC 8-2-2]

Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) content of coatings applied to automobile and light duty truck bodies, hoods, door, cargo boxes, fenders, and grill openings shall be limited as follows:

(a) the prime coating ELPO system, 006, is limited to 1.9 lb VOC/gallon (0.23 kg/l) less water.

(b) the final repair system, 012, is limited to 4.8 lb/gallon (0.58 kg/l) of VOC less water.

D.2.4 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:

(a) for the miscellaneous sealers and adhesives portion of source 009 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air or air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities, 006, and their control devices.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds Emissions

(a) Compliance with Condition D.2.1 shall be determined within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393(c).

(b) Compliance with Condition D.2.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [40 CFR 52.21]

The following facilities are required to stack test, when the incinerator abatement credit is used to show compliance with Condition D.2.1 and D.2.2, as follows:

(a) for one (1) of the thermal incinerators, #1 - #3, controlling the ELPO emissions, a stack test for capture and destruction efficiency shall be performed every two and one-half (2 ½) years, testing on an incinerator shall not be repeated until each one has been tested.

D.2.8 VOC Controls

The thermal incinerators #1 - #3 for the ELPO prime system shall be in operation at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Conditions D.2.1 and D.2.2.

D.2.9 VOC Control Requirements for the Thermal Incinerators #1 - #3 [326 IAC 2-2] [40 CFR 52.21][40 CFR 60, Subpart MM]

The following requirements are only necessary if the VOC reduction credit for the incinerators is used to show compliance with the emission limits:

(a) The temperature measurement device shall be installed in the firebox.

(b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 ^{o} C.

(c) The output of this system shall be recorded at least once every 15 minutes during production operation.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2, D.2.3, D.2.4, and D.2.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, D.2.3, and D.2.4.

(1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

(2) The monthly VOC input and VOC content of each of the following materials. Records may include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the type and amount used.

(A) ELPO coating additions
(B) Miscellaneous sealers, adhesives and solvents
(C) Final repair coatings and reducing solvents
(D) Maintenance coatings

(3) The weight of VOCs emitted for each month;

(4) The continuous temperature records (at least one record for every 15 minutes of operation) for the ELPO thermal incinerator if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the thermal incinerator fell more than 50 degrees F below the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 40 CFR 60.465(c), the Permittee shall submit a calendar quarterly report of any instances (during actual coating operations) in excess of 3 hours during which the hourly average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 degrees C (50 degrees F) below the latest compliant tested hourly average temperature. If no such periods occur, the Permittee shall submit a negative report.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) topcoat electrostatic/air atomized system, identified as 008, using a natural gas fired catalytic oxidizer ovens identified as #1 - #10 as VOC control, with maximum capacity of the oxidizer ovens #1 - #7 being 7.5 MM Btu/hr each, and the maximum capacity of oxidizer ovens #8 - #10 being 9.5 MM Btu/hr each, and water wash as PM control, and exhausting to stack 04,

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60, Subpart MM]

Pursuant to 40 CFR 60, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the topcoat system, 008, shall not exceed 1.47 kg/l of applied coating solids.

D.3.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC input to the source's surface coating operations shall be limited such that the VOC potential to emit shall be limited to 3,204 tons per twelve consecutive month period.

D.3.3 Automobile and Light Duty Truck Coating Operations [326 IAC 8-2-2]

Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) content of coatings applied to automobile and light duty truck bodies, hoods, door, cargo boxes, fenders, and grill openings shall be limited as follows:

(a) the topcoat system, 008, are limited to 15.1 lb VOC/gallon of applied coating solids, as determined by the EPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018 December 1988) and any subsequent revisions or 2.8 pounds of VOC/gallon (0.34 kg/l) of coating less water delivered to the applicator.

D.3.4 Particulate Matter Limit [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the topcoat system 008 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.3.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities, 008, and their control devices.

Compliance Determination Requirements

D.3.6 Volatile Organic Compounds Emissions [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

(a) Compliance with Condition D.3.1 shall be determined within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393(c).

(b) Compliance with Condition D.3.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [40 CFR 52.21]

The following facilities are required to stack test, when the oxidizer abatement credit is used to show compliance with Condition D.3.1 and D.3.2, as follows:

(a) for two (2) of the catalytic oxidizer ovens, #1 - #7, and one (1) of the catalytic oxidizer ovens, #8 - #10, controlling the topcoat emissions, a stack test for control efficiency shall be performed every two and one-half (2.5) years, testing on a catalytic oxidizer shall not be repeated until each one has been tested.

D.3.8 PM and VOC Controls [326 IAC 2-2] [40 CFR 52.21]

(a) The water wash shall be in operation at all times the topcoat surface coating is in operation, in order to comply with 326 IAC 6-3-2.

(b) The catalytic oxidizer ovens #1 - #10 for the topcoat system shall be in operation at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Conditions D.3.2 and D.3.3.

D.3.9 VOC Control Requirements for the Catalytic Oxidizer ovens #1 - #10 [326 IAC 2-2] [40 CFR 52.21][40 CFR 60, Subpart MM]

The following VOC control requirements are only necessary if the VOC reduction credit from the incinerators is used to show compliance with the emission limits:

(a) A temperature measurement device shall be installed in the gas stream immediately before and after the catalyst bed.

(b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 ^{o} C.

(c) The output of this system shall be recorded at least every 15 minutes during production operation.

D.3.10 Monitoring [326 IAC 2-2] [40 CFR 52.21]

PM Control:

(a) Monitor condition of the water wash system through the use of alarms on the water pumps that feed the system. Records of date of alarms and any corrective actions shall be maintained.

(b) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.11 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1, D.3.2, and D.3.3, and D.3.9, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2, and D.3.3.

(1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

(2) The monthly VOC input and VOC content of the material used in the topcoat system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The weight of VOCs emitted for each month;

(4) The continuous temperature records for the oxidizer if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliant stack test.

(b) To document compliance with Condition D.3.4, the Permittee shall maintain records as required under Condition D.3.9.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.3.12 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Conditions D.3.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 40 CFR 60.465(c), the Permittee shall submit a calendar quarterly report of any instances (during actual coating operations) in excess of 3 hours during which the hourly average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 degrees C (50 degrees F) blow the latest tested compliant hourly average temperature.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) primer surfacer system, identified as 010, using a natural gas fired regenerative thermal oxidizer with a maximum capacity of 16 MM Btu/hr as VOC control, and water wash as PM control, and exhausting to stack 03.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60, Subpart MM]

Pursuant to 40 CFR 60, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the primer surfacer, 010, shall not exceed 11.67 lb/gal of solids applied from each guidecoat operation.

D.4.2 PSD BACT Limits [326 IAC 2-2] [40 CFR 52.21]

Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC input to the source's surface coating operations shall be limited such that the VOC potential to emit shall be limited to 3,204 tons per twelve consecutive month period.

D.4.3 Particulate Matter Limit [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the primer surfacer 010 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

D.4.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities, 010, and their control devices.

Compliance Determination Requirements

D.4.5 Volatile Organic Compounds Emissions [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

(a) Compliance with Condition D.4.1 shall be determined within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393 Performance test and compliance provisions (c)(2) for the primer surfacer, 010, which uses a capture system and a control device that destroys VOC to comply with the emission limit specified.

(b) Compliance with Condition D.4.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.4.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 60, Subpart MM]

The following facilities are required to stack test to show compliance with Condition D.4.1 and D.4.2 as follows:

(a) for the regenerative thermal oxidizer controlling the primer surfacer emissions, a stack test for capture and destruction efficiency shall be performed every two and one-half (2.5) years.

(1) In subsequent months, the Permittee shall use the most recently determined capture fraction for the performance test;

(2) In subsequent months, the Permittee shall use the most recently determined VOC destruction efficiency for the performance test.

D.4.7 PM and VOC Controls [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

(a) The water wash shall be in operation at all times the primer surface coating is in operation, in order to comply with 326 IAC 6-3-2.

(b) The primer surfacer regenerative thermal oxidizer shall be in operation at all times the processes that they are controlling are in operation, in order to comply with Conditions D.4.1 and D.4.2.

D.4.8 VOC Control Requirements for the Primer Surfacer Regenerative Thermal Oxidizer [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

(a) The temperature measurement device shall be installed in the firebox.

(b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 ^{o} C.

(c) The output of this system shall be recorded at least once every 15 minutes during production operation.

D.4.9 Monitoring [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

(a) PM Control:

(1) Monitor condition of the water wash system through the use of alarms on the water pumps that feed the system. Records of dates of alarms and any corrective actions shall be maintained.

(2) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.4.10 Record Keeping Requirements

(a) To document compliance with Conditions D.4.1, D.4.2, D.4.3, and D.4.8, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1, D.4.2, D.4.3.

(1) The monthly VOC input amount and VOC content of each of the following materials. Records may include purchase orders, invoices, and material safety

data sheets (MSDS) necessary to verify the type and amount used.

(2) The monthly VOC input and VOC content of each of the materials used in the primer surfacer system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The weight of VOCs emitted for each month;

(4) The continuous temperature records (at least one record for every 15 minutes of operation) for the primer surfacer thermal incinerator if abatement credits are used to determine compliance, the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the thermal incinerator fell more than 50 degrees F below the temperature used to demonstrate compliance during the most recent compliance stack test.

(b) To document compliance with Condition D.4.3, the Permittee shall maintain records as required under Condition D.4.9.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.4.11 Reporting Requirements

(a) A quarterly summary of the information to document compliance with Condition D.4.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) Pursuant to 40 CFR 60.465(c), the Permittee shall submit a calendar quarterly report of any instances (during actual coating operations) in excess of 3 hours during which the hourly average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 degrees C (50 degrees F) blow the latest tested compliant hourly average temperature. If no such periods occur, the Permittee shall submit a negative report.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]: Insignificant Activities
Storage tanks, identified as 1(solvent/thinner), 2 (solvent/thinner), 7(automatic transmission fluid), 12 (fuel oil), 13 (fuel oil), 14 (fuel oil), 15 (fuel oil), and two (2) 18,900 gallon waste purge solvent tanks.

Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 New Source Performance Standards for Volatile Organic Liquid Storage Vessels [40 CFR 60, Subpart Kb]

Pursuant to 40 CFR 60, Subpart Kb, storage tanks 7, 12, 13, 14, 15, and two (2) 18,900 gallon waste purge solvent tanks, constructed after July 23, 1984, shall comply with 40 CFR 60.116b (a), (b), and (c).

D.5.2 Particulate Matter Limitations for Process Operations [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the grinding facilities shall not exceed 0.551 pounds per hour when operating at a process weight rate of less than 100 pounds per hour.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.3 Record Keeping Requirements

Pursuant to 326 IAC 12 and 40 CFR 60, Subpart Kb, storage tanks 1, 2, 7, 12, 13, 14, 15, and two (2) 18,900 gallon waste purge solvent tanks, constructed after July 23, 1984, shall comply with the following:

(a) maintain records of the dimensions and capacities of any storage vessel with capacities between 10,567 gallons and 19,813 gallons.

(b) maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for storage vessels with capacities between 19,813 and 39,890 gallons, storing a liquid with a maximum true vapor pressure greater than or equal to 15 kPa.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_x, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

(can omit identification of boiler affected if only one gas boiler at this plant)

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Boiler 003
Parameter: PM emissions (when burning natural gas)
Limit: 16 tons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Boiler 003
Parameter: PM emissions (when burning No. 2 and No.6 fuel oils)
Limit: 59 tons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Boiler 004
Parameter: No. 2 fuel oil usage (Fuel Oil Sulfur Content Limit 0.49%)
Limit: 1.1 million gallons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Boiler 005
Parameter: No. 2 fuel oil usage (Fuel Oil Sulfur Content Limit 0.49%)
Limit: 3.2 million gallons per 12 consecutive month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036
Facility: Entire Source
Parameter: VOC
Limit: 3,204 tons per consecutive 12 month period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	Emissions This Month	Emissions Previous 11 Months	Emissions 12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: General Motors Corporation
Source Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Mailing Address: 12200 Lafayette Center Road, Roanoke, IN 46783
Part 70 Permit No.: T003-5959-00036

Months: _____ **to** _____ **Year:** _____

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

June 24, 2002

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document for a Part 70 Operating Permit

Source Name:	General Motors Corporation
Source Location:	12200 Lafayette Center Road, Roanoke, IN 46783
County:	Allen
SIC Code:	3711
Operation Permit No.:	T003-5959-00036
Permit Reviewer:	Holly M. Stockrahm

On April 19, 2001, the Office of Air Quality (OAQ) had a notice published in the Fort Wayne Journal Gazette News Sentinel, Fort Wayne, Indiana, stating that General Motors Corporation had applied for a Part 70 Operating Permit to operate an automobile and light duty truck assembly plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On May 22, 2001, the source, General Motors Corporation (GMC), submitted the following comments. Comments made on the Technical Support Document (TSD) will not result in a change to the TSD. The OAQ prefers that the TSD reflect the permit that was on public notice. Change to the permit or technical support material that occur after public notice are documented in this Addendum to the Technical Support Document. This accomplishes the desired result of ensuring that these concerns are documented and part of the record regarding the permit decision. Changes to the permit are denoted by bolding **added language** and striking out ~~deleted language~~. The Table of Contents has been revised as needed.

Comment 1:
Section A.1 – General Motors requests that spelling of the responsible officials name be changed to James DeLuca instead of James Deluca.

Response to Comment 1:
IDEM agrees. Section A.1 has been changed as follows:
Responsible Official: James ~~Deluca~~ **DeLuca**

Comment 2:
Section A.2(a)(1) – Since General Motors is currently making an administrative change to the construction permit for boiler #3 to burn landfill gas, General Motors requests that this description

be changed to read as follows:

(1) One (1) natural gas/No. 6 oil/landfill gas fired boiler, identified as 003, ……..

Response to Comment 2:

IDEM agrees. The combustion of landfill gas will not increase the PTE (potential to emit), so the description under A.2(a)(1) and D.1 have been changed as follows:

(1) One (1) natural gas/~~No.2 fuel oil/~~No. 6 fuel oil **/ landfill gas** fired boiler, identified as 003,**…**

Comment 3:

Section A.2(a)(4) – General Motors requests that this description be revised to read, "Space and process heaters using natural gas…" This is requested so that there is no confusion that some of the heaters supply process units. General Motors also requests that this description include the twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour. These burners were permitted under Significant Source Modification No. 003-12830-00036.

Response to Comment 3:

IDEM agrees. Sections A.2(a)(4) and D.1 facility descriptions shall be revised as follows:

(4) Space heaters **and process heaters** using natural gas, identified as 007, with capacities from 10 to 100 MM Btu/hr, using no control, and exhausting to **various stacks denoted as** stack 13, **and twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) with emissions exhausted through their respective booth stacks denoted as SO4, each burner is rated at 12.6 MMBtu per hour.**

Comment 4:

Section A.3 – In this section, IDEM addresses insignificant units. General Motors is concerned that this section may create the impression that General Motors needs to revise the permit to include insignificant emissions units that are added or to remove from this section those that are removed from the site during the course of the permit term. Under 326 IAC 2-7-1(21)(K), a source may add, change or remove insignificant or trivial activities without a permit revision. This point should be clarified in the response to comments so that there is no confusion as to the source's obligations given that IDEM has included certain insignificant activities in the permit.

Response to Comment 4:

The insignificant emission units in Section A.3 and D.5 are specifically regulated by state

or federal rules. In many cases future additions or deletions of insignificant activities will not require a modification of this permit. However, a change in the number of insignificant emission units may result in a major modification at a major source of VOC pursuant to 326 IAC 2-2, Prevention of Significant Deterioration. If a VOC limit is necessary to avoid 326 IAC 2-2, then a permit modification would be required.

While the Title V Operating Permit rule requires that applications list all points of emissions (326 IAC 2-7-4 Permit Application) with additional provisions relating to insignificant and trivial activities (326 IAC 2-7-1 Definitions), the rule requires that the permit identify all applicable requirements (326 IAC 2-7-5 Permit Content). The OAQ ordinarily includes insignificant activities only as necessary to identify specific applicable requirements. There is no change to the permit as a result of this comment.

Comment 5:

Section B.3 - This section provides that limits on the source's potential emissions (PTE) shall be considered enforceable by both IDEM and the EPA Administrator. IDEM is in the process of revising its regulations to provide that PTE limits need only be enforceable by the state. This provision should be revised accordingly.

Response to Comment 5:

The relevant amendments to 326 2-2, PSD rule, became effective on January 19, 2002. 40 CFR 52.23 states that failure to comply with any condition in a permit resulting from an EPA -approved permit program shall render the source subject to federal enforcement under Section 113 of the Clean Air Act. There is no change to the permit as a result of this comment.

Comment 6:

Section B.7 - General Motors agrees with the requirements of paragraphs (b) and (c) of this condition. General Motors believes that paragraph (a) should be deleted, because that provision applies only during the application process. 326 IAC 2-7-4(b) states only the requirements for applications and the duty to supplement the application ends when the application has been approved and a permit issued. After permit issuance, the duty to provide information is governed by (1) the provisions of B.8(b) and (c) and the provisions governing permit revisions. General Motors concern is that tracking all of the information in the application throughout the permit term will be extremely difficult and time-consuming and will serve no useful purpose. Under Indiana's rules, if a requirement is applicable to the facility that is not included in the permit, General Motors has an obligation to apply for a permit modification and would do so. General Motors does not want to be under an obligation, however, to correct or supplement information in the application that does not affect the determination of applicable requirements (such as an incorrect serial or model number). Other states in US EPA Region V, e.g., Ohio, Illinois, have not included such a permit term because it is not a required permit term in the permit content section of EPA's regulations or the state regulations. The same is true of Indiana's regulations. General Motors notes also that Indiana's permit shield is expressly conditioned on the accuracy of the relevant information submitted so that deleting this duty to supplement will not prevent the Department from bringing appropriate enforcement actions. Accordingly, General Motors recommends deletion of paragraph (a).

As an alternative to completely deleting the paragraph, IDEM could adopt the approach used in Pennsylvania in recent Title V permits. The Pennsylvania permits contain a provision that states: "The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application shall submit such supplementary facts or corrected information during the permit renewal process."

Response to Comment 6:
IDEM disagrees. The source must notify IDEM as soon as possible of a change pursuant to 326 IAC 2-7-5(6)(E). If the change is within eighteen (18) months of renewal, IDEM may delay changing the permit until the renewal. There is no change to the permit as a result of this comment.

Comment 7:
Section B.11 - This section requires Preventive Maintenance Plans (PMPs) where specified in section D of the permit. General Motors objects to the requirements for PMPs because under the applicable regulations, PMPs only cover control devices. In sections D.1.5, D.2.5, D.3.5 and D.4.4, IDEM uses this provision to require PMPs for processes generally rather than just control devices. Therefore, General Motors recommends deletion of this provision.

Response to Comment 7:
The Preventive Maintenance Plan requirement must be included in every applicable Title V permit pursuant to 326 IAC 2-7-5 (13). Both of those rules refer back to the Preventive Maintenance Plan requirement found in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3 (a)(1),

(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2), and

(3) The identification and quantification of the replacement parts for the facility which the Permittee will maintain in inventory for quick replacement (326 IAC 1-6-3 (a)(2)).

Pursuant to 326 IAC 1-6-1 (Applicability), 326 IAC 1-6-3 applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-1-2 and 326 IAC 2-1-4. Therefore, it is clear from the structure of 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3 (a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, and not any other facility equipment. The units in question need a PMP to insure that they continue to function properly. In additional support of this position, 326 IAC 1-6-5 provides that the commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment. Therefore, there will be no change to the permit as a result of this comment.

Comment 8:
Section B.15 - This condition addresses deviations from permit requirements. Subsection (b) states

that "failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation." As discussed in more detail below, there are situations where the expected steps set forth in a compliance response plan may not be the most expedient or appropriate to respond to a given excursion. The facility should not be penalized for taking reasonable steps even if they deviate from the compliance response plan.

Response to Comment 8:
It is not a deviation for the Permittee take a response action outside of the approved CRP, however, the CRP will need to be amended and submitted to compliance. Additionally, EPA has specifically stated that if there is a requirement to do something in a permit, it is a deviation when the source does not do it [see 40 CFR 70.6(a)(6)(i)]. IDEM may use enforcement discretion in these cases, but we can not create an exemption through the TV permit. Condition B.15 has been modified as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. **A deviation** ~~Deviations that are~~ required to be reported ~~by~~ **pursuant to** an applicable requirement **that exists independently of this permit** shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

~~The notification by the Permittee~~ **The Quarterly Deviation and Compliance Monitoring Report** does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit**.** ~~or a rule. It does not include~~:

~~(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or~~

~~(2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.~~

~~A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.~~

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

Comment 9:

Section B.20(d) - The facility has not requested any alternative operating scenarios and requests that this be clarified in the permit or the Response to Comments. General Motors concern is that identified modes of operation in the permit that do not alter or affect the requirements that apply to the facility might be misconstrued as alternative operating scenarios requiring certain record keeping requirements to be met. By clarifying that no alternative scenarios were requested nor included in the permit, there will be no future confusion on this point.

Response to Comment 9:

IDEM agrees that General Motors has not requested any alternative operating scenarios at this time. There will be no change to the permit as a result of this comment.

Comment 10:

Section B.22(e) -The permit includes an "extra" inspection and entry authority that is not included in the authorizing regulations. Specifically, this very broad permit term states:

> Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAM, and US. EPA, or an authorized representative to perform the following:
>
> …
>
> (e) Utilize *any* photographic, recording, testing, monitoring, *or other equipment* for the purpose of assuring compliance with this permit or applicable requirements.

The permit cites to 326 IAC 2-7-6(6) as authority for this provision while citing to 326 IAC 2-7-6(2) as the authority for the first four inspection and entry provisions. Unlike the first four provisions which are quoted directly from the cited regulation, paragraph (e) purports to be based on 326 IAC 2-7-6(6)'s general authority to provide for "such other provisions as the commissioner may require" with respect to compliance with the permit. While this catchall provision in 2-7-6 does provide additional authority, it must be read in light of the preceding sections, which specifically state the scope of inspection and entry authority contemplated under the regulations. The ability to include such other provisions as the commissioner may require cannot reasonably be read as giving IDEM the authority to create broad based new compliance requirements in addition to those already specifically listed for inspection and entry and apply them throughout the state. If this were so, there would never be any reason to conduct rulemaking again. The commissioner could simply make up those rules he or she deems appropriate and impose them in permits. Instead, the only reasonable reading of this authority is that it is limited to specific situations for specific sources where the circumstances dictate an additional term in the permit needed to assure compliance. In the case at hand, IDEM has used this authority to insert a term that clearly would have been the subject of strong objection from the regulated community if the Agency had included it in the rulemaking when it was originally developed. Moreover, there is no explanation (given that only IDEM added this term in its initial Title V permits) as to why this provision was not included in

the original rulemaking package.

Substantively, General Motors concern with this provision is that it creates broad rights to enter the facility and conduct any range of activities using any range of equipment. Moreover, it references that it is for the purpose of assuring compliance with this permit or applicable requirements. The permit is supposed to include all applicable requirements under the Clean Air Act. Accordingly, including the phrase "or applicable requirements" might be misconstrued as referring all applicable requirements under any law whatsoever. Even if the general grant of authority which the permit cites could sustain the addition of an inspection and entry provision along the lines of that included here, even this general grant is limited to compliance with the permit. It is included in the section on "permit content" in the regulations, in the subsection that addresses compliance with the permit. General Motors believes that the intent of the language was to limit it to those requirements included in the permit but this needs to be clarified by revising the term to delete the phrase "or applicable requirements." In addition, consistent with subsection (d) of the provision, paragraph (e) should be preceded by the limiting phrase, "As authorized by the Clean Air Act," to clarify that this term is limited to Clean Air Act requirements and the authorities to take samples (which the photographs, recordings, etc. described in paragraph (e) clearly are) provided in the Act. General Motors also believes that IDEM should clarify that the introductory paragraph limits those that follow by requiring appropriate warrants where applicable and that the Permittee is not waiving its right to require such documents if it does not challenge this permit term.

Accordingly, General Motors requests that subparagraph (e) be deleted.

Response to Comment 10:
IDEM agrees that the intent of the language was to limit it to those requirements included in the permit. However, Condition B.22(e) will not be deleted. Under the Clean Air Act and IC 13-14-2-2, IDEM has the legal jurisdiction to implement B.22 Inspection and Entry. Instead, to clarify, Condition B.22(d) and (e) has been revised as follows:

(d) **As authorized by the Clean Air Act and IC 13-14-2-2,** ~~S~~ **s**ample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) **As authorized by the Clean Air Act and IC 13-14-2-2,** ~~**U**~~ **u**tilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

Comment 11:
Condition C.12 -This condition purports to require backup monitoring systems "to the extent practicable." General Motors objects to this condition as there is no authority in the regulation cited to impose this requirement. Moreover, the requirement is inconsistent with provisions Section D. For example, under Condition D.1.7(d), the facility is instructed to use AP-42 emissions factors when the monitoring equipment is not operating properly. Under Condition C.12, the facility is arguably required to take "hourly" readings of something, yet this would be inconsistent with D.1.7. In addition, the phrase "to the extent practicable" is vague and unenforceable because it does not define when specifically the

Permittee is required to use backup monitoring or when less or more frequent monitoring will be considered "practicable." Sources must be apprized of their obligations in the permit and this provision simply fails to provide adequate notice of what is required.

Response to Comment 11:

IDEM feels that this condition does fall under the authority granted by 326 IAC 2-7-5(3)(A)(iii) which states that IDEM may require conditions for monitoring equipment. This condition states what steps to take when the specific continuous monitoring device fails. IDEM feels that having specific monitoring requirements in the permit regarding monitoring devices will lessen the likelihood of violations of permit requirements. Condition C.12 states that in the event of a breakdown .....To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. It is not practicable to continuously perform calculations using AP42 factors in order to continuously determine emissions during downtime, therefore, the language "To the extent practicable" allows for the company to perform AP42 calculations to determine emissions during the duration of CEM downtime at whatever frequency. Condition C.12 has been changed as follows:

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once per ~~hour~~ **day** until such time as the continuous monitor is back in operation.

Comment 12:

Condition C.14 -General Motors requests that this provision be deleted. There is no basis for specifying these aspects of pressure drop indicators and no regulatory provision that authorizes this generic term.

Response to Comment 12:

IDEM, OAQ, agrees that the pressure drop requirements are inappropriate as the source does not control particulate with baghouses. However, monitoring the temperature for the thermal oxidizers, flow rate and the pressure gage for the water wash under (b) and (c) are appropriate. Condition C.14 shall be changed as follows:

C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)]
[326 IAC 2-7-6(1)]

(a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the~~

~~expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.~~

~~(b)~~ Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

~~(c)~~ **(b)** The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

Comment 13:
Condition C.17 - General Motors objects to this Condition. First, the language in this section is duplicative of language contained in Section D, which specifies clearly the compliance monitoring requirements. Restating those requirements here is duplicative and unnecessary and could result in multiple violations occurring from a single act or omission. Further, the language of this section goes beyond IDEM's authority in the referenced citations. The specified response requirements of a Compliance Response Plan are not reasonably ascertainable. Therefore, this term must be changed or deleted. Specifically, we are concerned that where the facility takes reasonable response steps that may differ from those specified in the plan, such action will be considered a violation of the permit. In many cases, maintenance personnel must make judgments during an excursion that, while reasonable, may deviate from the plan. Such actions should be encouraged rather than penalized. General Motors agrees with the 5% data capture allowance in the permit but believes that the term "adequate justification" should include situations where an employee fails to conduct monitoring due to another demand on time. For example, in some cases a process upset in another part of the plant may require the participation of employees that would normally conduct compliance monitoring. These cases should be considered adequate justification.

Response to Comment 13:
The Condition C.17 Compliance Monitoring Plan - Failure to Take Response Steps outlined the requirements of the CMP which is stated to include the Compliance Determination and Compliance Monitoring requirements of Section D, but does not duplicate those requirements.

326 IAC 2-7-5(1) requires that all Title V permits contain operational requirements and limitations that assure compliance with all applicable requirements. 326 IAC 2-7-5(3) requires that all Title V permits contain monitoring and related record keeping requirements which assure that all reasonable information is provided to evaluate continuous compliance with applicable requirements. 326 IAC 2-7-5(3)(A)(ii) requires that, at a minimum, the periodic monitoring requirements must be sufficient to yield reliable data from the relevant time period that are representative of the source's compliance, even where the applicable requirement does not require periodic testing or instrumental

monitoring.

Condition C.17(a)(2) allows response step outside of the CRP to be performed, but the CRP should be amended accordingly.

The IDEM, OAQ has restructured C.17 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains this discretion to excuse minor incidents of missing data; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or record keeping requirements may now be approved as minor permit modifications.

Condition C.17 (f) states that IDEM , at its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D. IDEM will review the failure of the Permittee to perform monitoring and record keeping on a case-by-case basis to determine whether the source has adequate justification. However, EPA disagrees and states that Part 70 does not allow an excuse from reporting failures. Therefore, the Condition C.17 is revised as follows:

C.17 Compliance ~~Monitoring~~ **Response** Plan - ~~Failure to Take Response Steps~~ **Preparation, Implementation, Records, and Reports** [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** ~~implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~

~~(1) This condition;~~

~~(2) The Compliance Determination Requirements in Section D of this permit;~~

~~(3) The Compliance Monitoring Requirements in Section D of this permit;~~

~~(4) The Record Keeping and Reporting Requirements in Section C (General~~

~~Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~

~~(5)~~ ~~A~~ **a** Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. **A** CRP~~'s~~ shall be submitted to IDEM, OAQ upon request ~~and shall be subject to review and approval by IDEM, OAQ~~. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee**, supplemented from time to time by the Permittee,** ~~and~~ maintained on site, and ~~is~~ comprised of:

~~(A)~~**(1)** Reasonable response steps that may be implemented in the event that ~~compliance related information indicates that~~ a response step is needed pursuant to the requirements of Section D of this permit; and **an expected time frame for taking reasonable response steps.**

~~(B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.~~

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition **as follows:** ~~Failure to take reasonable response steps may constitute a violation of the permit.~~

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) ~~Upon investigation of a compliance monitoring excursion, the~~ **The** Permittee is ~~excused from taking~~ **not required to take any** further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment **and** ~~This shall be an excuse from taking further response steps providing that~~ prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a~~n administrative amendment~~ **minor permit modification** to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

~~(d)~~**(e)** ~~Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken.~~ **The Permittee shall record all instances when response steps are taken.** In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

~~(e)~~**(f) Except as otherwise provided by a rule or provided specifically in Section D,** all monitoring **as** required in Section D shall be performed ~~at all times~~ **when** the ~~equipment~~ **emission unit** is operating, **except for time necessary to perform quality assurance and maintenance activities.** ~~If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~

~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record~~

~~keeping requirements in Section D.~~

Comment 14:

Condition C.20(a) -This provision should be revised to clarify that records may be maintained in computerized form. US EPA Region 5 has accepted a condition like this in Ohio. The Ohio permit term includes a statement that, "Such records may be maintained in computerized form." The provision should be revised to read as follows:

> Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time. Such records may be maintained in computerized form.

Response to Comment 14:

IDEM agrees. Condition C.20(a) has been changed as follows:

> (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time. **Such records may be maintained in computerized form.**

Section D.1

Comment 15:

Facility Description – (a) An administrative permit modification is in progress to allow this boiler to burn landfill gas. General Motors, therefore requests that the description be changed to include landfill gas as a fuel as shown in the comments for Section A.1. In addition, the description indicates boiler 003 is discharging through stack 2. This should be stack 1.

Response to Comment 15:

IDEM agrees. The facility description has been changed as specified under the Response to Comment 2.

Comment 16:

Facility Description – (d) General Motors requests that the description be revised to read "Space and process heaters using natural gas……" This is requested so that there is no confusion that some of the heaters supply process units. General Motors also requests that this description include the

twenty (20) natural gas fired burners identified as MOD 1 through MOD 10 air supply house burners (each mod air supply house contains two burners) each burner is rated at 12.6 MMBtu per hour and are exhausted through stack S04. These burners were permitted under Significant Source Modification No. 003-00036). General Motors requests that any applicable requirements identified in the modification permit be included in this operating permit.

Response to Comment 16:
IDEM agrees. The facility description has been changed as specified under Response to Comment 3.

Comment 17:
D.1.1.(b)(1) and D.1.2.(c)(2) – The NOx limitation of 0.09lb/MMBtu should be 0.098 lb/MMBtu pursuant to permit No. CP 003-2524.

Response to Comment 17:
IDEM agrees. D.1.1(b)(1) and D.1.2(c)(2) have been changed as follows:

(b)(1) NOx emissions shall not exceed 0.09**8** lb/MM Btu from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil. Compliance with this limit shall satisfy the requirements of 40 CFR 60, Subpart Db.

(c)(2) NOx emissions shall not exceed 0.09**8** lb/MM Btu from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil.

Comment 18:
D.1.4.(a) – Pursuant to calculation procedure in 326 IAC 6-2-4, the emission limit should be 0.27 for 240 MMBtu heat input.

Response to Comment 18:
IDEM disagrees. The calculation based on 326 IAC 6-2-4, is as follows:
For Boiler 003:
$Pt = 1.09/Q^{0.26}$
$Pt = 1.09/(240)^{0.26} = 1.09/4.1577 = 0.262$

Q in the above formula is the total heating capacity of the source. As each boiler is added, Q changes and, therefore, the limit changes. There is no change to this permit as a result of this comment.

Comment 19:
D.1.4.(b) and (c) - Pursuant to calculations procedure in 326 IAC 6-2-4, the emission limit should be 0.26 for 228 MMBtu heat input.

Response to Comment 19:
IDEM disagrees. According to 326 IAC 6-2-4, Q is the total source maximum operating capacity rating in million Btu per hour heat input. The calculations are as follows:
For Boiler 004:

$Pt = 1.09/Q^{0.26}$
$Pt = 1.09/(240 + 228)^{0.26} = 0.22$

For Boiler 005:
$Pt = 1.09/Q^{0.26}$
$Pt = 1.09/(240 + 228 + 228)^{0.26} = 0.20$

There is no change to the permit as a result of this comment.

Comment 20:
D.1.5 - General Motors requests that the requirement for preventive maintenance plans be deleted from the permit. Title V does not create new substantive requirements and preventive maintenance plans had never been determined to be required for this facility in past permits. While General Motors agrees that general requirements to operate and maintain equipment may apply under specific applicable requirements, none of these requires a preventive maintenance plan. General Motors notes that the regulation cited as the basis for this requirement 326 IAC 1-6-3 has been in place since 1988 and has never been included in an air permit for this site. General Motors notes that preventive maintenance plans are only required under Condition B.11 if specified by the Department in Section D of the permit. Thus, it seems clear that given the Department's prior recognition that preventive maintenance plans were not required for this facility and the discretion not to require it in the Title V permit, the plan provision should be deleted.

Response to Comment 20:
IDEM disagrees. Please see the Response to Comment 7. There is no change to the permit as a result of this comment.

Comment 21:
D.1.6 (a), (b), and (c)- General Motors requests that the word "or" be inserted between terms (a) and (b) and between (b) and (c), to make it clear that any one of the three methods may be used. Also in (b) the word "with" should be inserted between the words "noncompliance" and "the".

Response to Comment 21:
IDEM agrees. Condition D.1.6 has been changed as follows:

D.1.6 Sulfur Content Compliance [326 IAC 7-2-1]

Pursuant to 326 IAC 7-2-1, the Permittee shall demonstrate that the fuel oil sulfur content does not exceed 0.5 pounds per million Btu by:

(a) Fuel sampling and analysis data shall be collected pursuant to procedures specified in 326 IAC 3-7-4 for oil combustion, and this data may be used to determine compliance or noncompliance with the emission limitations contained in 326 IAC 7-1-1. Computation of calculated sulfur dioxide emission rates from fuel sampling and analysis data shall be based on AP-42 emission factors. Fuel sampling and analysis data shall be collected as follows:

(1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and

(2) If a partially empty tank is refilled, a new sample and analysis would be required upon filling**, or**

(b) Compliance or noncompliance **with** the emission limitation specified in 326 IAC 7-1.1 may be determined by conducting a stack test for sulfur dioxide emissions from the boilers, using 40 CFR 60, Appendix A, Method 6, 6A, 6C, or 8, in accordance with the procedures in 326 IAC 3-6**, or**

(c) Upon written notification of a facility owner or operator to the department, continuous emission monitoring data collected and reported pursuant to 326 IAC 3-5 may be used as the means for determining compliance.

(d) A determination of noncompliance by any of the methods specified in (a), (b), or (c) above shall not be refuted by evidence of compliance pursuant to the other methods.

Comment 22:

D.1.7.(a) - The continuous emissions monitors should be used to determine compliance with Conditions D.1.1 in addition to conditions D.1.2 and D.1.3 and not Condition D.1.4. Thus D.1.1 should be added and D.1.4 should be deleted. The CEMs monitor only sulfur dioxide, nitrogen oxides and opacity consistent with the requirements of D.1.1, D.1.2, and D.1.3.

Response to Comment 22:

IDEM agrees. Condition D.1.7 (a) has been changed as follows:

(a) Pursuant to 326 IAC 2-2, 326 IAC 3-5, and 326 IAC 12, the Permittee shall continuously monitor and record the following parameters from each boiler to demonstrate compliance with the Conditions **D.1.1,** D.1.2, **and** D.1.3~~, and D.1.4~~:

Comment 23:

D.1.7.(d)- General Motors requests that this term be revised to read as follows:

In the instances of CEM downtime compliance with the NOx and SO_2 emission limits established in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by the use of the appropriate AP42 emission factors. Compliance with the particulate emission limits contained in Conditions D.1.2 and D.1.4 shall be determined using the appropriate emission factors, or by burning clean fuels such as natural gas, landfill gas or distillate fuel oil.

Response to Comment 23:

IDEM agrees, however, the source may still be in violation for missing data. Condition D.1.7(d) shall be revised as follows:

(d) In instances of **CEM** downtime, ~~the source shall use EPA's AP-42 emission factors for commercial boilers, to demonstrate compliance with the NOx, SO2, and PM limits established under conditions D.1.2, D.1.3, and D.1.4.~~ **compliance with the NOx and SO_2 emission limits established in Conditions D.1.1, D.1.2 and D.1.3 shall be determined by the use of the appropriate AP42 emission factors. Compliance with the particulate emission limits contained in Conditions D.1.2 and D.1.4 shall be determined using the appropriate emission factors, or by burning clean fuels such as natural gas, landfill gas or distillate**

fuel oil.

Section D.2

Comment 24:

Facility Description – Since there is only one afterburner in the system, General Motors requests that the description for the gasoline fill operation be change as follows:

> *One (1) gasoline fill operation, identified as 014, using a natural gas afterburner with a maximum capacity of 0.15 MM Btu/hr as VOC control and exhausting to stack 12*

Response to Comment 24:

IDEM agrees. The A.2 and D.2 descriptions have been changed as follows:

One (1) gasoline fill operation, identified as 014, using a natural gas afterburner~~s 1 and 2, each~~ with a maximum capacity of 0.15 MM Btu/hr as VOC control, and exhausting to stack 12.

Comment 25:

Facility Description – General Motors requests that the ELPO description be revised to read as follows:

> *One (1) ELPO prime coating system, identified as 006, using……..*
> Prime coating more accurately depicts the process and is consistent with the NSPS wording.

Response to Comment 25:

IDEM agrees. The A.2 and D.2 descriptions have been changed as follows:

One (1) ELPO ~~dipping~~ **prime coating** system, identified as 006, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02,

Comment 26:

D.2.1 – General Motors requests the phrase "from each prime coating operation" be deleted as it is redundant with the specifically named ELPO system in the same sentence.

Response to Comment 26:

IDEM agrees. Condition D.2.1 has been changed as follows:

D.2.1 NSPS Performance Standards for Automobile and Light Duty Truck Manufacturers [40 CFR 60, Subpart MM]

Pursuant to 40 CFR 60, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions from the ELPO **prime coating** system, 006, shall not exceed 0.17 kg/l of applied coating solids ~~from each prime coating operation~~.

Comment 27:

D.2.4 – General Motors requests that the terms be revised as follows, so it is clear that the 3.5 lb VOC limit and the application equipment cleanup applies only to the miscellaneous sealers and adhesives portion of source 009:

(a) for the miscellaneous sealers and adhesives portion of source 009 shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air or air dried coatings and the solvents sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Response to Comment 27:
IDEM agrees. The 326 IAC 8-2-9 applies only to those coatings under 009 which are applied to metal surfaces. Condition D.2.4 (a) has been changed as follows:

(a) for the miscellaneous sealers and adhesives **portion of source 009** shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air or air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Comment 28:
D.2.5 - General Motors requests that the requirement for preventive maintenance plans be deleted from the permit. Title V does not create new substantive requirements and preventive maintenance plans had never been determined to be required for this facility in past permits. While General Motors agrees that general requirements to operate and maintain equipment may apply under specific applicable requirements, none of these requires a preventive maintenance plan. General Motors notes that the regulation cited as the basis for this requirement 326 IAC 1-6-3 has been in place since 1988 and has never been included in an air permit for this site. General Motors notes that preventive maintenance plans are only required under Condition B.11 if specified by the Department in Section D of the permit. Thus, it seems clear that given the Department's prior recognition that preventive maintenance plans were not required for this facility and the discretion not to require it in the Title V permit, the plan provision should be deleted.

Response to Comment 28:
IDEM disagrees. Please see the Response to Comment 7. There is no change to the permit as a result of this comment.

Comment 29:
D.2.6 – In order to allow for either the use or non-use of abatement credit, and to clarify that this is a compliance determination not a physical demonstration, General Motors requests that term (a) and (b) be revised as follows:

(a) Compliance with Condition D.2.1 shall be determined within 30 days of the end of each month based on 40 CFR 60, Subpart MM,§60.393(c).

(b) Compliance with Condition D.2.2 shall be determined within 30 days of the

end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

By ending the cite at 393 (c) allows for the use of either (c) (1) or (2) for determining compliance.

Response to Comment 29:

IDEM agrees. Condition D.2.6 (a) has been changed as follows:

D.2.6 Volatile Organic Compounds Emissions

(a) Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393(c)~~(1) Performance test and compliance provisions (c)(1) for the ELPO system, 006, which does not use a capture system and a control device that destroys VOC to comply with the emission limit specified~~.

(b) Compliance with Condition D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Comment 30:

D.2.7 – General Motors requests that this term be revised as follows to require testing only if the incinerator credit is used in the compliance determination. Since there are ongoing temperature measurements which insure proper operation of the incinerator, if testing is required at all, it should be required only once during the 5 year permit cycle on a representative incinerator.

The following facilities are required to stack test, when the incinerator abatement credit is used to show compliance with Condition D.2.1 and D.2.2 as follows:

(a) for one representative thermal incinerator either #1, #2, or #3 controlling the ELPO emissions, a stack test for destruction efficiency be performed every five (5) years

Since the capture efficiency (CE) does not vary under normal operating conditions there is no need to test for CE.

Response to Comment 30:

IDEM disagrees. The goal of stack testing is to demonstrate continuous compliance with the established limits. Failure of the thermal incinerator would have significant environmental impact. Therefore, IDEM believes that the stack testing frequency (based on whether the unit has the potential of emitting greater than 100 tons per year of VOC before control, has an applicable requirement for VOC, is located at a major source, and has actual emissions greater than 10 tons per year) should be every 2 ½ years. However, if the control device is not utilized to comply with a limit, testing would not be necessary. The source may petition to skip one test cycle if the unit in its most recent stack test

(within 5 years) has demonstrated actual emissions less than 50% of the applicable limit and there have been no procedural or operational changes. The source should submit a request to IDEM no later than 360 days prior to the due date of the test requesting an exemption from the current permit cycle test. Condition D.2.7 has been changed as follows:

D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [40 CFR 52.21]

The following facilities are required to stack test**, when the incinerator abatement credit is used** to show compliance with Condition D.2.1 and D.2.2, as follows:

(a) for one (1) of the thermal incinerators, #1 - #3, controlling the ELPO emissions, a stack test for capture and destruction efficiency shall be performed every two and one-half (2.5) years, testing on an incinerator shall not be repeated until each one has been tested.

Comment 31:

D.2.8 – General Motors requests here as above that the term be revised as follows to not require operation of the incinerators if the abatement credit is not used to show compliance.

The thermal incinerators #1-#3 for the ELPO prime system shall be in operation at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Condition D.2.1 and D.2.2

Condition D.2.4 included in this term in the draft permit is the miscellaneous metals coating operation which does not have an incinerator.

Response to Comment 31:

IDEM agrees. Condition D.2.8 has been changed as follows:

D.2.8 VOC Controls

The thermal incinerators #1 - #3 for the ELPO prime system shall be in operation at all times the processes that they are controlling are in operation, **if the abatement credit is used to show compliance** ~~in order to comply~~ with Conditions **D.2.1 and** D.2.2 ~~and D.2.4~~.

Comment 32:

D.2.9(a)(1)(A) – General Motors requests that this term be revised as shown below to be consistent with the requirement of the NSPS.

(A) A continuous monitoring system shall be calibrated, maintained and operated on the VOC control devices for measuring operating temperature. The output of this system shall be recorded, and that temperature shall not be less than 50 degrees F below the temperature used to demonstrate compliance during the most recent representative stack test.

Response to Comment 32:

IDEM agrees that the condition should be modified, however, the language above does not reflect the

language in the NSPS. Condition D.2.9 should be under the Compliance Determination Section as it is explicitly required to establish compliance. The rule does not specify that the average temperature never be more than 50 degrees F below the temperature used to demonstrate compliance during the most recent stack test. The rule states that "every three hour period shall be reported during which the average temperature is more than 28 degrees C (50 degrees F) during the most recent control device performance test" which demonstrated compliance. Condition D.2.9(a)(1)(A), D.2.10(a)(4), and D.2.11 (b) has been changed as follows:

~~**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**~~

D.2.9 ~~Monitoring~~ **VOC Control Requirements for the Thermal Incinerators #1 - #3** [326 IAC 2-2] [40 CFR 52.21]**[40 CFR 60, Subpart MM]**

~~(a) VOC control:~~**The following requirements are only necessary if the VOC reduction credit for the incinerators is used to show compliance with the emission limits:**

~~(1) The thermal incinerators #1 - #3 have applicable compliance monitoring conditions as specified below:~~

~~(A) A continuous monitoring system shall be calibrated, maintained, and operated on the VOC control devices for measuring operating temperature. The output of this system shall be recorded, and the average temperature shall be equal to or greater than the used to demonstrate compliance during the most recent compliant stack test. with that temperature never being more than 50 degrees F below the temperature used to demonstrate compliance during the most recent compliant stack test.~~

(a) The temperature measurement device shall be installed in the firebox.

(b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 º C

(c) The output of this system shall be recorded at least once every 15 minutes during production operation.

D.2.10 Record Keeping Requirements

(a) (4) The continuous temperature records **(at least one record for every 15 minutes of operation)** for the ELPO thermal incinerator if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliance stack test, **and every three hour period during which the thermal incinerator fell more than 50 degrees F below the temperature used to demonstrate compliance during the most recent compliance**

stack test.

D.2.11 Reporting Requirements

(b) Pursuant to 40 CFR 60.465(c), the Permittee shall submit a calendar quarterly report of any instances (during actual coating operations) in excess of 3 hours during which the hourly average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 degrees C (50 degrees F) below the latest tested compliant hourly average temperature. If no such periods occur, the Permittee shall submit a negative report.

Comment 33:
D.2.10 – General Motors requests that this section be revised as shown below in order to properly account for VOC emissions and delete items not required to determine compliance.

(1) No Change

(2) The monthly amount and VOC content of each of the following materials. Records may include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the type and amount used.

(A) ELPO coating additions
(B) Miscellaneous sealers, adhesives and solvents
(C) Final repair coatings and reducing solvents
(D) Maintenance coatings

(3) Delete (no need for specific dates only that the materials were used during the month.)

(4) Delete (included in (2) above)

(5) Delete (included in (2) above)

(6) The amount of VOCs emitted each month

(7) The continuous temperature records for the ELPO thermal incinerator if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliance stack test

(8) Delete - There is no applicable requirement for this monitoring and it is not needed for any compliance determination. Duct pressure and fan amperage would only be an indication of airflow for which there is no baseline or requirement. In addition any failure of airflow would make the process inoperable because of employee concerns and product quality.

Response to Comment 33:
IDEM agrees. Condition D.2.10 has been changed as follows:

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.1, D.2.2, D.2.3, D.2.4, and D.2.9, the Permittee shall maintain records in accordance with (1) through (~~8~~ **4**) below. Records maintained for (1) through (~~8~~ **4**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1, D.2.2, D.2.3, and D.2.4.

(1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

(2) The monthly ~~volume weighted average mass~~ **VOC input and VOC content of each of the following materials. Records may include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the type and amount used.** ~~of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.~~

(A) ELPO coating additions
(B) Miscellaneous sealers, adhesives and solvents
(C) Final repair coatings and reducing solvents
(D) Maintenance coatings

(3) ~~A log of the dates of use~~;

~~(4) The cleanup solvent usage for each month;~~

~~(5) The total VOC usage for each month~~;

~~(6)~~ The weight of VOCs emitted for each month;

~~(7)~~**(4)** The continuous temperature records for the ~~VOC control~~ **ELPO thermal incinerator if abatement credits are used to determine compliance,** and the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the thermal incinerator fell more than 50 degrees F below the temperature used to demonstrate compliance during the most recent compliance stack test.

~~(8) Weekly records of the duct pressure or fan amperage~~.

Section D.3

Comment 34:

D.3.5 – General Motors requests that the requirement for preventive maintenance plans be deleted from the permit. Title V does not create new substantive requirements and preventive maintenance plans had never been determined to be required for this facility in past permits. While General Motors agrees that general requirements to operate and maintain equipment may apply under specific applicable requirements, none of these requires a preventive maintenance plan. General Motors notes that the regulation cited as the basis for this requirement 326 IAC 1-6-3 has been in place since 1988 and has never been included in an air permit for this site. General Motors notes that preventive maintenance plans are only required under Condition B.11 if specified by the Department in Section D of the permit. Thus, it seems clear that given the Department's prior recognition that preventive maintenance plans were not required for this facility and the discretion not to require it in the Title V permit, the plan provision should be deleted.

Response to Comment 34:

IDEM disagrees. Please see the Response to Comment 7. There is no change to the permit as a result of this comment.

Comment 35:

D.3.6 - In order to allow for either the use or non-use of abatement credit, and to clarify that this is a compliance determination not a physical demonstration, General Motors requests that term (a) and (b) be revised as follows:

(a) Compliance with Condition D.3.1 shall be determined within 30 days of the end of each month based on 40 CFR 60, Subpart MM,§60.393(c).

(b) Compliance with Condition D.3.2 shall be determined within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

By ending the cite at 393 (c) allows for the use of either (c) (1) or (2) for determining compliance.

Response to Comment 35:

IDEM agrees. Condition D.3.6 has been changed as follows:

D.3.6 Volatile Organic Compounds Emissions [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

(a) Compliance with Condition D.3.1 shall be demonstrated within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393 **(c).** ~~Performance test and compliance provisions (c)(1) for the topcoat system, 008, which does not use a capture system and a control device that destroys VOC to comply with the emission limit specified.~~

(b) Compliance with Condition D.3.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Comment 36:

D.3.7 - General Motors requests that this term be revised as follows to require testing only if the oxidizer abatement credit is used in the compliance determination. Since there is on-going temperature measurements which insure proper operation of the oxidizer, if testing is required at all, it should be required only once during the 5 year permit cycle on a representative oxidizer.

> *The following facilities are required to stack test, when the oxidizer abatement credit is used to show compliance with Condition D.3.1 and D.3.2 as follows:*
>
> *(a) for one representative oxidizer of the 10 controlling the topcoat emissions, a stack test for destruction efficiency be performed every five (5) years*
>
> Since the capture efficiency (CE) does not vary under normal operating conditions, there is no need to test for CE.

Response to Comment 36:

IDEM disagrees. The goal of stack testing is to demonstrate continuous compliance with limits. Failure of the thermal incinerator would have significant environmental impact. Therefore, IDEM believes that the stack testing frequency (based on whether the unit has the potential of emitting greater than 100 tons per year of VOC before control, has an applicable requirement for VOC, is located at a major source, and has actual emissions greater than 10 tons per year) should be every 2 ½ years. However, if the control device is not utilized to comply with a limit, testing would not be necessary. The source may petition to skip one test cycle if the unit in its most recent stack test (within 5 years) has demonstrated actual emissions less than 50% of the applicable limit and there has been no procedural or operational changes. The source should submit a request to IDEM no later than 360 days prior to the due date of the test requesting an exemption from the current permit cycle test. Condition D.3.7 has been changed as follows:

D.3.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [326 IAC 2-2] [40 CFR 52.21]

The following facilities are required to stack test**, when the oxidizer abatement credit is used** to show compliance with Condition D.3.1 and D.3.2, as follows:

(a) for two (2) of the catalytic oxidizer ovens, #1 - #7, and one (1) of the catalytic oxidizer ovens, #8 - #10, controlling the topcoat emissions, a stack test for control efficiency shall be performed every two and one-half (2.5) years, testing on a catalytic oxidizer shall not be repeated until each one has been tested.

Comment 37:

D.3.8 (b) - General Motors requests, here, as above that the term be revised as follows to not require operation of the oxidizer if the abatement credit is not used to show compliance.

> *The catalytic oxidizers #1-#10 for the topcoat system shall be in operation at all times the processes that they are controlling are in operation, if the abatement credit is used to show compliance with Condition D.3.1 and D.3.2*

Response to Comment 37:
IDEM agrees. Condition D.3.8(b) has been changed as follows:

(b) The catalytic oxidizer ovens #1 - #10 for ~~top coaters~~ **the topcoat system** shall be in operation at all times the processes that they are controlling are in operation, ~~in order to comply~~**, if the abatement credit is used to show compliance** with Conditions D.3.2 and D.3.3.

Comment 38:
D.3.9(a)(1)(A) - General Motors requests that this term be revised as shown below to be consistent with the requirement of the NSPS.

(A) A continuous monitoring system shall be calibrated, maintained and operated on the VOC control devices for measuring operating temperature. The output of this system shall be recorded, and that temperature shall not be less than 50 degrees F below the temperature used to demonstrate compliance during the most recent representative stack test.

Response to Comment 38:
IDEM disagrees with the proposed language above, please see Response to Comment 32. Conditions D.3.9, D.3.11(a)(4), and D.3.12 (b) has been changed to the language proposed under that Response.

D.3.9 ~~Monitoring~~ **VOC Control Requirements for the Catalytic Oxidizer Ovens #1 - #10** [326 IAC 2-2] [40 CFR 52.21]**[40 CFR 60, Subpart MM]**

The following VOC control requirements are only necessary if the VOC reduction credit from the incinerators is used to show compliance with the emission limits.

(a) A temperature measurement device shall be installed in the gas stream immediately before and after the catalyst bed.

(b) A continuous monitoring system on the VOC control devices for measuring operating temperature shall be calibrated, maintained, and operated according to accepted practice and manufacturer's specifications. The device shall have an accuracy of ± 0.75 percent of the temperature being measured expressed in degrees Celsius or ± 0.25 º C.

(c) The output of this system shall be recorded at least every 15 minutes during production operation.

D.3.11 Record Keeping Requirements

(a) (4) The continuous temperature records **(at least one record for every 15 minutes of operation)** for the ELPO thermal incinerator if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliance stack test, **and every**

three hour period during which the average temperature immediately before the catalyst bed, when the coating system is operational, is greater than 28 degrees C (50 degrees F) below than the average temperature used to demonstrate compliance during the most recent stack test. In addition, every three hour period shall be reported each quarter during which the average temperature difference across the catalyst bed when the coating system is operational is less than 80 % of the average temperature difference of the device during the most recent stack test demonstrating compliance.

D.3.12 Reporting Requirements

(b) Pursuant to 40 CFR 60.465(c), the Permittee shall submit a calendar quarterly report of any instances (during actual coating operations) in excess of 3 hours during which the hourly average temperature in any thermal incinerator used to control emissions from an affected facility remains more than 28 degrees C (50 degrees F) blow the latest tested compliant hourly average temperature. If no such periods occur, the Permittee shall submit a negative report.

Comment 39:
D.3.9(a)(1)(B) – Pursuant to the comment for D.3.5 above, General Motors requests that this term be deleted. It is standard practice for investigation and corrective action to take place if the temperatures fall below the control limits.

Response to Comment 39:
IDEM agrees.

~~(B) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.~~

Comment 40:
D.3.9(b)(1) – General Motors requests that this term be deleted including Subparts (A), (B) and (C) and be replaced with the following monitoring requirement which has been accepted in EPA Region 5.

Monitor condition of the water wash system through the use of alarms on the water pumps that feed the system. Records of date of alarms and any corrective actions shall be maintained.

Response to Comment 40:
IDEM agrees. Condition D.3.9(b)(1) has been changed as follows:

PM Control:

(a) **Monitor condition of the water wash system through the use of alarms on the water pumps that feed the system. Records of date of alarms and any corrective actions shall be maintained.** ~~Daily visual inspections shall be performed~~

~~of all surface coating booths used in vehicle production to verify that for the water wash systems:~~

~~(A) the continuous underflow water wash is operating properly to provide full coverage of the flood pan, and~~

~~(B) the downdraft air system is providing sufficient air flow for normal booth operation.~~

~~(C) Weekly observation shall be made of the water wash systems to determine whether any visible over spray is leaving the booths.~~

(b) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Comment 41:
D.3.9(b)(2) – General Motors requests that this term along with Subparts (A) and (B) be deleted since there are no dry filters used on the exhaust system for the topcoat booths.

Response to Comment 41:
IDEM agrees. Condition D.3.9(b)(2) shall be deleted as follows:

~~(1) Surface coating booths using dry filters as control shall perform:~~

~~(A) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the over spray from the surface coating booth stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(B) Monthly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in over spray emission, or evidence of over spray emission is observed.~~

Comment 42:

D.3.10(a) – General Motors requests that this section be revised as shown below in order to properly account for VOC emissions and delete items not required to determine compliance.

(1) No Change

(2) The monthly amount and VOC content of each of the materials used in the topcoat system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the type and amount used.

(3) Delete (no need for specific dates only that the materials were used during the month.)

(4) Delete (included in (2) above)

(5) Delete (included in (2) above)

(6) The amount of VOCs emitted each month

(7) The continuous temperature records for the oxidizer if abatement credits are used to determine compliance, and the temperature used to demonstrate compliance during the most recent compliance stack test

(8) Delete - There is no applicable requirement for this monitoring and it is not needed for any compliance determination. Duct pressure and fan amperage would only be an indication of airflow for which there is no baseline or requirement. In addition any failure of airflow would make the process inoperable because of employee concerns and product quality.

Response to Comment 42:
IDEM agrees. Condition D.3.11(a) has been changed as follows:

D.3.11 Record Keeping Requirements

(a) To document compliance with Conditions D.3.1, D.3.2, and D.3.3, and D.3.9, the Permittee shall maintain records in accordance with (1) through (~~8~~ **4**) below. Records maintained for (1) through (~~8~~ **4**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.3.1, D.3.2, and D.3.3.

(1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

(2) The ~~amount~~ **monthly VOC input** and VOC content of ~~each coating material and solvent used~~ **the material used in the topcoat system**. Records

~~shall~~ **may** include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

(3) ~~A log of the dates of use~~;

~~(4) The cleanup solvent usage for each month;~~

~~(5) The total VOC usage for each month;~~

~~(6)~~ The weight of VOCs emitted for each month;

~~(7)~~**(4)** The continuous temperature records for the ~~VOC~~ ~~control~~ **oxidizer if abatement credits are used to determine compliance,** and the temperature used to demonstrate compliance during the most recent compliant stack test.

~~(8) Weekly records of the duct pressure or fan amperage~~.

Comment 43:
D.3.10(b) - Pursuant to the comments above, replacing the inspections with pump alarm monitoring, General Motors requests that this term be deleted.

Response to Comment 43:
IDEM disagrees. Under D.3.10(a), record keeping is required, the condition has been changed as follows:

(b) To document compliance with Condition D.3.4, the Permittee shall maintain records **as** ~~of the results of the inspections~~ required under Condition D.3.9.

Section D.4

Comment 44:
D.4.4 - General Motors requests that the requirement for preventive maintenance plans be deleted from the permit. Title V does not create new substantive requirements and preventive maintenance plans had never been determined to be required for this facility in past permits. While General Motors agrees that general requirements to operate and maintain equipment may apply under specific applicable requirements, none of these requires a preventive maintenance plan. General Motors notes that the regulation cited as the basis for this requirement 326 IAC 1-6-3 has been in place since 1988 and has never been included in an air permit for this site. General Motors notes that preventive maintenance plans are only required under Condition B.11 if specified by the Department in Section D of the permit. Thus, it seems clear that given the Department's prior recognition that preventive maintenance plans were not required for this facility and the discretion not to require it in the Title V permit, the plan provision should be deleted.

Response to Comment 44:
IDEM disagrees. Please see the Response to Comment 7. There is no change to the permit as a result of this comment.

Comment 45:
D.4.5 – General Motors requests that the word "demonstrated" in Subparts (a) and (b) be replaced with the word "determined" to clarify that no physical demonstration is required.

Response to Comment 45:
IDEM agrees. Conditions D.2.6, D.3.6, and D.4.5 has been changed as follows:

D.2.6 Volatile Organic Compounds Emissions

(a) Compliance with Condition D.2.1 shall be ~~demonstrated~~ **determined** within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393(c).

(b) Compliance with Condition D.2.2 shall be ~~demonstrated~~ **determined** within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.3.6 Volatile Organic Compounds Emissions [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

(a) Compliance with Condition D.3.1 shall be ~~demonstrated~~ **determined** within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393(c).

(b) Compliance with Condition D.3.2 shall be ~~demonstrated~~ **determined** within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.4.5 Volatile Organic Compounds Emissions [326 IAC 2-2] [40 CFR 52.21] [40 CFR 60, Subpart MM]

(a) Compliance with Condition D.4.1 shall be ~~demonstrated~~ **determined** within 30 days of the end of each month based on 40 CFR 60, Subpart MM, §60.393 Performance test and compliance provisions (c)(2) for the primer surfacer, 010, which uses a capture system and a control device that destroys VOC to comply with the emission limit specified.

(b) Compliance with Condition D.4.2 shall be ~~demonstrated~~ **determined** within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Comment 46:
D.4.6 – General Motors requests that a destruction efficiency be required only once during the permit term (every 5 years). Since the temperature of the oxidizer is monitored continuously to determine is

the unit is operating properly there is no need for physical testing. General Motors also requests that the requirement to do capture efficiency (CE) testing be deleted. The only time CE would change would be if there was a significant change in the process, since this has not occurred, the CE is the same as determined in the initial test.

Response to Comment 46:
IDEM disagrees. Please see the Response to Comment 30. There has been no change to the permit as a result of this comment.

Comment 47:
D.4.8(a)(1)(C) - General Motors requests that this term be revised as shown below to be consistent with the requirement of the NSPS.

> (C) *The output of this system shall be recorded, and that temperature shall not be less than 50 degrees F below the temperature used to demonstrate compliance during the most recent representative stack test.*

Response to Comment 47:
IDEM disagrees. Please see the Response to Comment 32. Condition D.4.8 has been moved to the Compliance Determination and has been changed. Conditions D.4.10 and D.4.11have been revised in line with the Response to Comment 32.

Comment 48:
D.4.8(a)(1)(D) – Pursuant to the comment on D.4.4 above, General Motors requests that this term be deleted . It is standard practice for investigation and corrective action to take place if the temperatures fall below the control limits.

Response to Comment 48:
IDEM agrees. D.4.8(a)(1)(D) has been deleted as follows:

> ~~(D) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.~~

Comment 49:
D.4.8(b)(1) – General Motors assumes that this section identified in the permit as D.4.8(b)(2) was miss labeled and should in fact be D.4.8(b)(1). General Motors requests that this term be deleted including Subparts (A), (B) and (C) and be replaced with the following monitoring requirement which has been accepted in EPA Region 5.

> *Monitor condition of the water wash system through the use of alarms on the water pumps that feed the system. Records of dates of alarms and any corrective actions shall be maintained.*

Response to Comment 49:

IDEM agrees. Condition D.4.8(b)(1) has been changed as follows:

(b) PM Control:

(1) **Monitor condition of the water wash system through the use of alarms on the water pumps that feed the system. Records of dates of alarms and any corrective actions shall be maintained.** ~~Daily visual inspections shall be performed of all surface coating booths used in vehicle production to verify that for the water wash systems:~~

~~(A) the continuous underflow water wash is operating properly to provide full coverage of the flood pan, and~~

~~(B) the downdraft air system is providing sufficient air flow for normal booth operation.~~

~~(C) Weekly observation shall be made of the water wash systems to determine whether any visible over spray is leaving the booths.~~

(2) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

Comment 50:

D.4.8(b)(2) - General Motors requests that this term along with Subparts (A) and (B) be deleted since there are no dry filters used on the exhaust system for the topcoat booths.

Response to Comment 50:

IDEM agrees. Condition D.4.8(b)(2) has been deleted as follows:

~~(2) Surface coating booths using dry filters as control shall perform:~~

~~(A) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the over spray from the surface coating booth stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(B) Monthly inspections shall be performed of the coating emissions from the stack and the presence of over spray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in over spray emission, or evidence of over spray emission is~~

~~observed.~~

Additionally, the descriptions under A.4 are changed as follows:

One (1) final repair operation, identified as 012, using ~~water wash for PM~~ **no** control, and exhausting to stack 06 and spot repair stalls,

One (1) maintenance paint operation, identified as 013, using ~~dry filters as~~ **no** control, and exhausting to stack 10,

And, finally, D.4.8 (c) has been changed to be in line with the requirements of the NSPS:

(c) The output of this system shall be recorded at least once every 15 minutes during production operation.

Comment 51:

D.4.9 - General Motors requests that this section be revised as shown below in order to properly account for VOC emissions and delete items not required to determine compliance.

(1) No Change

(2) The monthly amount and VOC content of each of the materials used in the primer surfacer system. Records may include purchase orders, invoices, and material safety data sheets (MSDS) as necessary to verify the type and amount used.

(3) Delete (no need for specific dates only that the materials were used during the month.)

(4) Delete (included in (2) above)

(5) Delete (included in (2) above)

(6) The amount of VOCs emitted each month

(7) No change

(8) Delete - There is no applicable requirement for this monitoring and it is not needed for any compliance determination. Duct pressure and fan amperage would only be an indication of airflow for which there is no baseline or requirement. In addition any failure of airflow would make the process inoperable because of employee concerns and product quality.

Response to Comment 51:

IDEM agrees. Condition D.4.9 has been changed as follows:

D.4.9 Record Keeping Requirements

(a) To document compliance with Conditions D.4.1, D.4.2, D.4.3, and D.4.8, the Permittee

shall maintain records in accordance with (1) through (~~8~~ **4**) below. Records maintained for (1) through (~~8~~ **4**) shall be taken as stated below and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.4.1, D.4.2, D.4.3.

(1) The monthly volume weighted average mass of VOC emitted per volume of applied coating solids for the prime coat as specified in 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations.

(2) The ~~amount~~ **monthly VOC input** and VOC content of each ~~coating material and solvent used.~~ **of the materials used in the primer surfacer system.** Records ~~shall~~ **may** include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

(3) ~~A log of the dates of use;~~

~~(4) The cleanup solvent usage for each month;~~

~~(5) The total VOC usage input for each month;~~

~~(6)~~ The weight of VOCs emitted for each month;

~~(7)~~**(4)** The continuous temperature records **(at least one record for every 15 minutes of operation)** for the primer surfacer thermal incinerator that are used to determine compliance, the temperature used to demonstrate compliance during the most recent compliance stack test, and every three hour period during which the thermal incinerator fell more than 50 degrees F below the temperature used to demonstrate compliance during the most recent compliance stack test.

~~(8) Weekly records of the duct pressure or fan amperage.~~

Comment 52:

D.4.9(b) - Pursuant to the comments above, replacing the inspections with pump alarm monitoring, General Motors requests that this term be deleted.

Response to Comment 52:

IDEM disagrees. Condition D.4.9(a)(1) requires record keeping, the condition D.4.10(b) has been deleted as follows:

(b) To document compliance with Condition D.4.3, the Permittee shall maintain records **as** ~~of the results of the inspections~~ required under Condition D.4.~~8~~**9**.

Section D.5

Comment 53:
Facility Description – the facility description of the tanks should read as follows:

> *Storage tanks, identified as 1,(solvent/thinner), 2, (solvent/thinner), 7,(automatic transmission fluid), 12, (fuel oil), 13,(fuel oil), 14, (fuel oil), 15, (fuel oil), and two (2) 18,900 gallon waste purge solvent tanks.*

Response to Comment 53:
IDEM agrees. The description has been changed as follows:
Storage tanks, identified as **1, (solvent/thinner), 2 (solvent/thinner), 7 (automatic transmission fluid), 12 (fuel oil), 13 (fuel oil), 14 (fuel oil), 15 (fuel oil), and two (2) 18,900 gallon waste purge solvent tanks.** ~~7, 12, 13, 14, 15, and two (2) 18,900 gallon waste purge solvent tanks,~~

Comment 54:
D.5.3 – General Motors requests that this term be revised adding tanks 1 and 2 and that term (c) be deleted since none of the tanks have capacities greater than 39,890 gallons.

Response to Comment 54:
IDEM agrees. Condition D.5.3 has been changed as follows:
D.5.3 Record Keeping Requirements

Pursuant to 326 IAC 12 and 40 CFR 60, Subpart Kb, storage tanks, **1, 2,** 7, 12, 13, 14, 15, and two (2) 18,900 gallon waste purge solvent tanks, constructed after July 23, 1984, shall comply with the following:

(a) maintain records of the dimensions and capacities of any storage vessel with capacities between 10,567 gallons and 19,813 gallons.

(b) maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for storage vessels with capacities between 19,813 and 39,890 gallons, storing a liquid with a maximum true vapor pressure greater than or equal to 15 kPa.

~~(c) maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for storage vessels with capacities greater than 39,890 gallons, storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa.~~

Upon further review, the OAQ has decided to make the following revisions to the permit. The Table Of Contents has been modified to reflect these changes.

1. B.2 Permit Term has a new rule cite added to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January

19th, 2002.

B.2 Permit Term [326 IAC 2-7-5(2)] **[326 IAC 2-1.1-9.5]**

2. Compliance with Permit Conditions has been revised to clarify that noncompliance with any requirement of this permit may result in an enforcement action against the Permittee, an action to modify, revoke, reissue or terminate the source's permit, and/or a denial of the Permittee's application to renew the permit. In addition, except for those permit conditions that are not federally enforceable, noncompliance is also a violation of the federal Clean Air Act.

B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provision of this permit ~~except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and~~ is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) Noncompliance with any provisions of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.

(c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

3. B.12 Emergency Provisions (a)(b) and (g) have been revised to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002. This section of the rule is now consistent with 40 CFR 70.6(g) and provides an affirmative defense to an action brought for non-compliance with technology based emission limitations only.

B.12 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation~~, except as provided in 326 IAC 2-7-16.~~

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to

an action brought for noncompliance with a ~~health-based or~~ technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

~~(g) Operations may continue during an emergency only if the following conditions are met:~~

~~(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.~~

~~(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:~~

~~(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and~~

~~(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.~~

~~Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.~~

4. B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

~~B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]~~

~~Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.~~

5. B.14 Prior Permits Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5 under the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19th, 2002.

B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

6. Remove (b) from B.13 Permit Shield. Since B.14 Prior Permits Superceded has been added to the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

~~(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.~~

7. **Certification by Responsible Official** Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM has re-visited this issue with EPA. C.8 has been clarified so that the Permittee understands that the asbestos notification should be certified by the owner or operator and not the responsible official. C.18 now requires a certification by the R.O. for the notification sent in response to non-compliance with a stack test.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]

[326 IAC 2-7-6]

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do ~~not~~ require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

9. Condition D.1.1 needs to be clarified as follows:

D.1.1 New Source Performance Standards (NSPS) for Fossil-Fuel-Fired Steam Generators [40 CFR 60, Subpart Db]

(b) Boiler 004, constructed in April, 1992, is subject to the requirements of NSPS, 326 IAC 12, (40 CFR 60.44, Subpart Db) because the boiler was constructed after the applicability date of the rule. Pursuant to 40 CFR 60.44b(a),

(1) ~~Pursuant to 326 IAC 2-2-3 (PSD BACT),~~ NOx emissions from Boiler 004 shall not exceed 0.098 lb/ MM Btu for natural gas and 0.13 for No. 2 fuel oil combustion. Compliance with this limit will satisfy the requirements of 40 CFR 60, Subpart Db **and 326 IAC 2-2-3 (PSD BACT)**.

10. Condition D.1.8 has been expanded to require record keeping of the heat inputs of the boilers in order to correctly calculate lb/MM Btu limits:

D.1.8 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3, the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the NOx, SO_2, and opacity emission limits established in Conditions D.1.1, D.1.2, and D.1.3.

(1) Calendar dates covered in the compliance determination period;

(2) The Permittee shall record the output of the continuous monitoring systems and shall perform the required record keeping, pursuant to 326 IAC 3-5-6.

(b) **The Permittee shall keep records of heat input for each of the boilers.**

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

June 24, 2002
Indiana Department of Environmental Management
Office of Air Quality
Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	General Motors Corporation
Source Location:	12200 Lafayette Center Road, Roanoke, IN 46783
County:	Allen
SIC Code:	3711
Operation Permit No.:	T003-5959-00036
Permit Reviewer:	Holly M. Stockrahm

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from General Motors Corporation relating to the operation of an automobile and light duty truck assembly plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Facility-wide natural gas usage, including combustion units described as follows:

(1) One (1) natural gas/No.2 fuel oil/No. 6 fuel oil fired boiler, identified as 003, with a maximum capacity of 240 MM Btu/hr, using low excess air as control, and exhausting to stack 01,

(2) One (1) natural gas/No.2 fuel oil fired boiler, identified as 004, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NOx burners and flue gas recirculation as control, and exhausting to stack 01,

(3) One (1) natural gas/No. 2 fuel oil fired boiler, identified as 005, with a maximum capacity of 228 MM Btu/hr for natural gas, and 220 MM Btu/hr for No. 2 fuel oil, using low NOx burners and flue gas recirculation as control, and exhausting to stack 01,

(4) Space heaters using natural gas, identified as 007, with capacities from 10 to 100 MM Btu/hr, using no control, and exhausting to stack 13,

(b) One (1) ELPO dipping system, identified as 006, using natural gas thermal incinerators identified as #1 through #3 on the drying ovens as VOC control, and exhausting to stack 02,

(c) One (1) topcoat electrostatic/air atomized system, identified as 008, using a natural gas fired catalytic oxidizer ovens identified as #1 - #10 as VOC control, with maximum capacity of the oxidizer ovens #1 - #7 being 7.5 MM Btu/hr each, and the maximum capacity of oxidizer ovens #8 - #10 being 9.5 MM Btu/hr each, and water wash as PM control, and exhausting to stack 04,

(d) Miscellaneous sealers/adhesives/additives/solvents, identified as 009, using no controls, and exhausting to stacks 07 and 08,

(e) One (1) primer surfacer system, identified as 010, using a natural gas fired regenerative thermal oxidizer with a maximum capacity of 16 MM Btu/hr as VOC control, and water wash as PM control, and exhausting to stack 03,

(f) One (1) final repair operation, identified as 012, using water wash for PM control, and exhausting to stack 06 and spot repair stalls,

(g) One (1) maintenance paint operation, identified as 013, using dry filters for PM control, and exhausting to stack 10,

(h) One (1) gasoline fill operation, identified as 014, using a natural gas afterburner with a maximum capacity of 0.15 MM Btu/hr as VOC control, and exhausting to stack 12.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Space heaters, process heaters, or boilers using the following fuels:
  (1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(b) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons.

(c) The following VOC and HAP storage containers:
  (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughput less than 12,000 gallons.

  (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(d) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

(e) Closed loop heating and cooling systems.

(f) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.

(g) Any operation using aqueous solutions containing less than 1% by weight of VOCs, excluding HAPs.

(h) Noncontact cooling tower systems with either of the following:
  (1) Natural draft cooling towers not regulated under a NESHAP.

(i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.

(j) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone.

(k) Paved and unpaved roads and parking lots with public access.

(l) Equipment used to collect any material that might be released during a malfunction,

process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(m) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(n) On-site fire and emergency response training approved by the department.

(o) Emergency generators as follows:
(1) Diesel generators not exceeding 1600 horsepower.

(p) Other emergency equipment as follows:
(1) Stationary fire pumps.

(q) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(r) A laboratory as defined in 326 IAC 2-7(21)(D).

(s) Other activities or categories not previously identified with emissions less than insignificant thresholds:
(1) Fluorocarbon R-134A Storage Tanks (Main Plant);
(2) Sulfuric Acid Storage Tank (Wastewater Treatment Plant);
(3) Grinding Operations (Light Duty Truck Body Shop);
(4) Pre-phosphate Washers (Light Duty Truck Assembly Line);
(5) Multi-stage Phosphate Systems (Light Duty Truck Assembly Line);
(6) Feather Dusters (Light Duty Truck Assembly Line);
(7) Vehicle washers prior to shipping (Light Duty Truck Assembly Line)
(8) Spot sanding and painting (Light Duty Truck Assembly Line);
(9) Bulk Storage Material Transferring Equipment; i.e. pumps, valves, pipes, flanges, etc. (Light Duty Truck Assembly Line);
(10) Vehicle Fluid Fill Operations; i.e. engine oil, windshield, transmission, engine coolant, power steering fluid, brake fluid, and air conditioning refrigerant (Light Duty Truck Assembly Line);
(11) Engine Subassembly Lines (Light Duty Truck Assembly Line);
(12) Radiator Subassembly Lines (Light Duty Truck Assembly Line);
(13) Trim Assembly Lines (Light Duty Truck Assembly Line);
(14) Maintenance Shops (Light Duty Truck Assembly Line)
(15) Gasoline/Diesel Tank Assembly Areas (Light Duty Truck Assembly Line);
(16) Mechanical Repair Stalls (Light Duty Truck Assembly Line);
(17) Final Vehicle Inspection (Care Building);
(18) Wastewater Treatment Plant;
(19) Storage Tanks;
(20) Body Washers;
(21) Mig Welding;
(22) Diesel Pumps; and
(23) Storage tanks, 1, 2, 7, 12, 13, 14, 15, and two (2) 18,900 gallon waste purge solvent tanks.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) PSD (02) 1575, issued on November 30, 1984,

(a) CP (003) 2000, Plt ID 003-00036, issued on September 9, 1991,

(b) CP 003-2524, Plt ID 003-00036, issued on October 13, 1992,

(c) CP 003-3069, issued on May 31, 1994,

(d) OP 35-12-90-0146 through -0158, and -0160,

(e) CP 003-3418-00036, issued on August 3, 1994,

(f) R 003-5142-00036, issued on July 24, 1996,

(g) E 003-5854-00036, issued on July 15, 1996,

(h) R 003-9181-00036, issued on February 9, 1998,

(i) E 003-10352-00036, issued on March 30, 1999, and

(j) Amendment 003-10921-00036, issued on June 1, 1999.

PSD permit (02) 1575, issued on November 30, 1984, has the following changes:

(a) The source removed the wheel paint operations, therefore, referral to the wheel paint operations as part of the assembly plant operations covered in the permit has been deleted.

(b) Condition 1 j. stating " That the hours of operation for the assembly plant shall be limited to 5,094 hours per year," has been deleted. Although the source's 5,094 hours of operation per year was the basis for the enforceable VOC emission limit of 3,204 tons per year, the limit is redundant and not practically enforceable, therefore, this limit has been deleted.

Operation permit 35-12-90-0156 issued on December 15, 1986, for the wheel paint operations were not included in the Title V because the equipment has been removed.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on May 29, 1996. Additional information was received on October 7, 1997. A notice of completeness letter was mailed to the source on February 10, 1997.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	greater than 250
VOC	greater than 250
CO	greater than 100, less than 250
NO_x	greater than 250

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
individual HAPs	greater than 10*
TOTAL	greater than 25*

*The individual HAPs information was not submitted in the TV application per "Guidance for the Implementation of the U.S. EPA White Paper." However, the source is assumed to have greater than 10 tons of a single HAP, and 25 tons of a combination of HAPs, and, therefore, is considered a major source of HAPs. There are no applicable rules for existing major sources of HAPs at this time, so it is not necessary to quantify the HAPs at this time.

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM10, SO_2, VOC, CO, and NOx are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 1998 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	48.713
PM-10	48.713

SO_2	4.459
VOC	1701.640
CO	30.113
NO_x	116.550
HAP	>10 of single, >25 of combined

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls.

(a) The Boilers have the following requirements:

(1) Pursuant to Permit PSD (02) 1575, issued on November 30, 1984, Boiler 003:

(A) NOx emissions shall not exceed 0.2 lb/MM Btu from the combustion of natural gas or 0.3 lb/MM Btu from the combustion of fuel oil. This limit is federally enforceable.

(B) The PM emissions shall not exceed 0.015lb/MM Btu when combusting natural gas, or 0.056 lb/MM Btu when combusting fuel oil.

(2) Pursuant to CP (003) 2000, issued on September 9, 1991, Boiler 004 PSD BACT for NOx is Flue Gas Regeneration (FGR) and Low NOx Burners (LNB). NOx emissions shall not exceed 0.098 lb/MM Btu input from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu input from the combustion of No. 2 fuel oil. The use of these controls is federally enforceable.

(3) Pursuant to CP003-2524, issued on October 13, 1992, Boiler 005 fuel input limits are such that the boiler emissions for SO2 and NOx are below the threshold for PSD modifications, therefore, those limits are not federally enforceable. (No. 2 fuel consumption shall not exceed 3.2 million gallons, and with an average heat content of 140,000 Btu/gallons, based on a 12 month rolling average, this fuel input limit shall, in effect, limit NOx emissions to less than 40 tons per consecutive 12 month period. Boiler 005 shall not exceed 0.5 lb/MM Btu when combusting No. 2 fuel oil. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) do not apply.)

(b) Pursuant to Permit PSD (02) 1575, issued on November 30, 1984, the source has an entire source VOC limit of 3,204 tons of VOC per 12 month consecutive period. This limit is based on total VOC from all surface coating and cleaning operations. The federal enforceability of the controls is discussed as follows:

(1) ELPO dipping system, identified as 006,

(A) For VOC, uses natural gas thermal incinerators identified as #1 through #3 on the drying ovens as control. The actual dipping is not controlled, the drying process is controlled. The control was not included in the NSPS Equivalency Demonstration or in the calculated maximum pounds of VOC per hour and ton per year emission rates. Therefore, it is not necessary to make the control federally enforceable. ELPO emissions are calculated as follows:
{VOC Input to ELPO dipping system in tons per month x (1 - control efficiency)} = Total VOC Emissions (ton/mo)

(B) For PM, no control is necessary, because the transfer efficiency for dip coating is 100%.

(2) The topcoat electrostatic/air atomized system, identified as 008,

(A) for VOC, natural gas fired catalytic oxidizer ovens identified as #1 - #10 as control, with maximum capacity of the oxidizer ovens #1 - #7 being 7.5 MM Btu/hr each, and the maximum capacity of oxidizer ovens #8 - #10 being 9.5 MM Btu/hr each is used as control. The actual painting application process is not controlled, only the drying process is controlled. In calculating emissions, 80% of the topcoat VOC emissions are emitted before the reaching the dryer, where of the remaining 20%, 98% are controlled by the oxidizer ovens. Again, the control was not included in the NSPS Equivalency Demonstration or in the calculated maximum pounds of VOC per hour and ton per year emission rates. Therefore, it is not necessary to make the control federally enforceable. Topcoat emissions calculations are as follows: {VOC Input to top coating in tons per month x ((100 - controlled emissions)/100)} + {(VOC Input to top coating in tons per month x (100 - uncontrolled emissions)/100)) x (1 - control efficiency)} = Total VOC Emissions from Top coating (tons/mo)

(B) For PM, a water wash is used as control. Transfer efficiencies have been determined to be 89% for automatic electrostatic spray application, and 47% for air atomized application. The transfer efficiencies are based on actual testing and are lower than the default values of transfer efficiencies for the type of application performed. IDEM agrees to these transfer efficiencies as constants for the purpose of determining the monthly volume weighted average of the total mass of VOC per volume of coating solids used as required by 40 CFR 60, Subpart MM.

(3) The primer surfacer system, identified as 010,

(A) For VOC, uses a natural gas fired regenerative thermal oxidizer with a maximum capacity of 16 MM Btu/hr as VOC control. An overall control efficiency of 78.4% based on a capture of 80% and a destruction efficiency of 95%, is necessary for compliance with the 40 CFR 60, Subpart MM limit of 1.4 kg VOC/l of applied coating solids. Therefore, the use of the regenerative thermal oxidizer as control on the Primer Surfacer system, is federally enforceable. Primer surfacer emissions calculations are as follows: {VOC Input to primer surfacer in tons per month x (capture efficiency (89%) x (1 - destruction efficiency)} = Total VOC Emissions from Primer Surfacer (tons/mo)

(B) For PM, uses water wash as control.

(c) One (1) final repair operation, identified as 012,

(1) For VOC, uses no control,

(2) For PM, uses water wash as control.

(d) One (1) maintenance paint operation, identified as 013,

(1) For VOC, uses no control,

(2) For PM, uses dry filters control.

(e) One (1) gasoline fill operation, identified as 014,

(1) For VOC, uses a natural gas afterburner with a maximum capacity of 0.15 MM Btu/hr as control,

(2) For PM, uses no control.

	Limited Potential to Emit (tons/year)					
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_X
coating operations				3,204		
Boiler 003, natural gas	16	16				
Boiler 003, fuel oil	59	59	1682 for #6 526 for #2			
Boiler 004, natural gas						98
Boiler 004, fuel oil			40			125
Boiler 005, natural gas						98
Boiler 005, fuel oil			482			40
Total Emissions	not all PM emitting units included		not all SO2 emitting units included	3,204 Source limit		not all NOx emitting units included

County Attainment Status

The source is located in Allen County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Allen County has been classified as attainment or unclassifiable for CO, SO2, PM, and PM10. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Part 70 Permit Conditions

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

(a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.

(b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

Federal Rule Applicability

(a) Boiler 003, constructed in August, 1985, is not subject to New Source Performance Standard (NSPS), 326 IAC 12, (40 CFR 60.44, Subpart Db), because the boiler predates the applicability of the rule

(b) Boiler 004, constructed in April, 1992, is subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60.44, Subpart Db) because the boiler was constructed after the applicability date of the rule. Pursuant to 40 CFR 60.44b(a),

(1) Pursuant to 326 IAC 2-2-3 (PSD BACT), NOx emissions from Boiler 004 shall not exceed 0.098 lb/ MM Btu for natural gas and 0.13 for No. 2 fuel oil combustion. Compliance with this limit will satisfy the requirements of 40 CFR 60, Subpart Db.

(2) Opacity shall not exceed 20% for 6-min average except for one 6-min period per hour of not more than 27% opacity. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

(3) SO2 emissions shall not exceed 0.5 pound per million Btu heat input when burning No. 2 fuel.

(c) Boiler 005, constructed in March, 1993, is subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR 60.44, Subpart Db) because the boiler was constructed after the applicability date of the rule. Pursuant to 40 CFR 60.44b,

(1) NOx emissions shall not exceed 0.09 lb/MM Btu from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil. Compliance with this limit shall satisfy the requirements of 40 CFR 60, Subpart Db.

(2) Opacity shall not exceed 20% for 6-min average except for one 6-min period per hour of not more than 27% opacity. The opacity standards apply at all times, except during periods of startup, shutdown, or malfunction.

(d) Pursuant to 40 CFR 60, Subpart MM (Performance Standards for Automobile and Light Duty Truck Manufacturers), the VOC emissions

(1) from the ELPO system, 006, shall not exceed 0.17 kg/l of applied coating solids from each prime coating operation

(2) from the topcoat system, 008, shall not exceed 1.47 kg/l of applied coating solids.

(3) from the primer surfacer, 010, shall not exceed 11.67 lb/gal of solids applied from each guidecoat operation.

(e) Pursuant to 40 CFR 60, Subpart Kb, storage tanks, 7, 12, 13, 14, 15, and two (2) 18,900

gallon waste purge solvent tanks, constructed after July 23, 1984, shall comply with the following:

(1) maintain records of the dimensions and capacities of any storage vessel with capacities between 10,567 gallons and 19,813 gallons.

(2) maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for storage vessels with capacities between 19,813 and 39,890 gallons, storing a liquid with a maximum true vapor pressure greater than or equal to 15 kPa.

(3) maintain a record of the VOL stored, the period of storage, and the maximum true vapor pressure of the VOL during the respective storage period for storage vessels with capacities greater than 39.890 gallons, storing a liquid with a maximum true vapor pressure greater than or equal to 3.5 kPa.

(f) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

(1) The degreasing processes are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart T because they do not use halogenated solvents.

State Rule Applicability - Entire Source

326 IAC 2-2-3 (Best Available Control Technology)

Pursuant to 326 IAC 2-2-3 PSD BACT:

(a) for Boiler 003:

(1) PM emissions from Boiler 003 shall not exceed 0.015 lb/MM Btu when combusting natural gas, or 0.056 lb/MM Btu when combusting No. 2 or No. 6 fuel oil. Compliance with this limit shall satisfy the requirements of 326 IAC 6-2-4.

(2) PM emissions shall not exceed 16 tons per year from the combustion of natural gas, and shall not exceed 59 tons per 12 consecutive month period from the combustion of No. 2 and No. 6 fuel oil.

(3) NOx emissions shall not exceed 0.2 lb/MM Btu when combusting natural gas, or 0.3 lb/MM Btu when combusting fuel oil. These limits are considered PSD BACT for this facility.

(b) for Boiler 004:

(1) No. 2 fuel consumption shall not exceed 1.1 million gallons and this, with a fuel sulfur content of 0.49 % shall in effect limit SO2 emissions to less than 40 tons per 12 consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) does not apply.

(2) NOx emissions shall not exceed 0.098 lb/MM Btu input from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu input from the combustion of No. 2 fuel oil. Fuel gas recirculation and low NOx burners are considered PSD BACT for this facility.

(c) for Boiler 005:

(1) No. 2 fuel consumption shall not exceed 3.2 million gallons, and with an average heat content of 140,000 Btu/gallons, based on a 12 month rolling average, NOx emissions shall, in effect, limit NOx emissions to less than 40 tons per consecutive 12 month period. Therefore, the requirements of 326 IAC 2-2

(Prevention of Significant Deterioration) does not apply.

(2) NOx emissions shall not exceed 0.09 lb/MM Btu from the combustion of natural gas or shall not exceed 0.13 lb/MM Btu from the combustion of No. 2 fuel oil.

(d) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration), total VOC input to the source's surface coating operations shall be limited such that the VOC potential to emit shall be limited to 3,204 tons per twelve consecutive month period.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of VOC and NOx. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 7-1.1-2

Pursuant to 326 IAC 7-1.1-2, SO2 emissions:

(a) from Boiler 003 shall not exceed 1.6 lb/MM Btu when combusting No. 6 fuel oil, or 0.5 lb/MM Btu when combusting No. 5 fuel oil.

(b) from Boiler 004 shall not exceed 0.5 lb/MM Btu when combusting No. 2 fuel oil,

(c) from Boiler 005 shall not exceed 0.5 lb/MM Btu when combusting No. 2 fuel oil.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

Pursuant to 326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations), the volatile organic compound (VOC) content of coatings applied to automobile and light duty truck bodies, hoods, door, cargo boxes, fenders, and grill openings shall be limited as follows:

(a) the prime coating ELPO system, 006, is limited to 1.9 lb VOC/gallon (0.23 kg/l) less water,

(b) the topcoat system, 008, and the primer surfacer system, 010, are limited to 15.1 lb VOC/gallon of applied coating solids, as determined by the EPA "Protocol for Determining the Daily Volatile Organic Compound Emission Rate of Automobile and Light-Duty Truck Topcoat Operations" (EPA-450/3-88-018 December 1988) and any subsequent revisions or 2.8 pounds of VOC/gallon (0.34 kg/l) of coating less water delivered to the applicator,

(c) the final repair system, 012, is limited to 4.8 lb/gallon (0.58 kg/l) of VOC less water.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator:

(a) for the miscellaneous sealers and adhesives, 009, shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for forced warm air or air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDSes submitted by the source, the sealers and adhesives are in compliance with this requirement.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), particulate matter (PM) emissions from the 240, 228, and 228 million BTU/hour boilers, 003, 004, and 005, shall be limited as follows:

(a) Boiler 003 shall be limited to 0.26 pound per million BTU heat input.

(b) Boiler 004 shall be limited to 0.22 pound per million BTU heat input.

(c) Boiler 005 shall be limited to 0.20 pound per million BTU heat input.

326 IAC 6-3-2 (Process Operations)

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the topcoat system 008 and 010 shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The water wash shall be in operation at all times the topcoat surface coating is in operation, in order to comply with this limit.

Testing Requirements

Title V operating permits are a tool to ensure continuous compliance. Testing emissions from a stack is the preferred emission rate at any point in time and for calibrating other monitoring methods.

Under normal guidance, the following facilities would be required to stack test as follows:

(a) For boilers greater than 100 MM Btu per hour the following is required:

(1) for natural gas fired boilers, 003, 004, and 005, a stack test for NOx shall be performed every two and one-half (2.5) years.

(2) for oil-fired boilers, 003, 004, and 005, a stack test for opacity and NOx shall be performed every two and one-half (2.5) years.

However, the boilers, 003, 004, and 005 are equipped with continuous emission monitors for NOx, SO2, and Opacity, therefore, stack testing is not required.

(b) A VOC source with a VOC control device should be tested if VOC allowables are greater than 10 pounds per hour by rule. The following facilities are required to stack test as follows:

(1) on one of the thermal incinerators, #1 - #3, controlling the ELPO emissions, a

stack test for control efficiency shall be performed every two and one-half (2.5) years.

(2) on one of the catalytic oxidizer ovens, #1 - #7, and on one of the catalytic oxidizer ovens, #8 - #10, controlling the topcoat emissions, a stack test for control efficiency shall be performed every two and one-half (2.5) years, and

(3) on the regenerative thermal oxidizer controlling the primer surfacer emissions, a stack test for control efficiency shall be performed every two and one-half (2.5) years.

Compliance Requirements

Permits issued under 326 IAC 2-7are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) VOC control:

(1) The thermal incinerators #1 - #3, catalytic oxidizer ovens #1 - #10, and primer surfacer regenerative thermal oxidizer, and the gasoline fill afterburner have applicable compliance monitoring conditions as specified below:

(A) A continuous monitoring system shall be calibrated, maintained, and operated on the VOC control devices for measuring operating temperature. The output of this system shall be recorded, and the average temperature shall be equal to or greater than the temperature used to demonstrate compliance during the most recent compliant stack test with that temperature never being more than 50 degrees F below the temperature used to demonstrate compliance during the most recent compliant stack test.

(B) The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when the reading is below the above mentioned temperature for any one reading.

These monitoring conditions are necessary because the VOC controls must operate properly to ensure compliance with PSD Limits and BACT [326 IAC 2-2-3] [40 CFR 52.21], and 326 IAC 2-7 (Part 70).

(b) PM Control:

(1) Daily visual inspections shall be performed of all surface coating booths used in vehicle production to verify that for the water wash systems:

(A) the continuous underflow water wash is operating properly to provide full coverage of the flood pan, and

(B) the downdraft air system is providing sufficient air flow for normal booth operation.

(C) Weekly observation shall be made of the water wash systems to determine whether any visible overspray is leaving the booths.

(2) Surface coating booths using dry filters as control shall perform:

(A) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stack while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(B) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed.

(3) Boilers combusting No. 2 or No. 6 fuel:

(a) Daily visible emission notations of the boiler stack exhausts shall be performed during normal daylight operations only when burning No. 2 or No. 6 fuel oil and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because the particulate matter controls must operate properly to ensure compliance with PSD Limits and BACT [326 IAC 2-2-3] [40 CFR 52.21], and 326 IAC 2-7 (Part 70).

(a) The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section D - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the 1990 Clean Air Act. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Quality (OAQ) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act.

Conclusion

The operation of this automobile and light duty truck assembly plant shall be subject to the conditions of the attached proposed **Part 70 Permit No. T003-5959-00036**.